INDEPENDENCE MALL WEST PHILADELPHIA, PA. 19105. U S A. TELEPHONE (215) 592-3000
CABLE ADDRESS: ROHMHAAS TELEX 845-247 TWX 710-670-5335 TELECOPIER (215) 592-3377

Direct Dial - (215) 592-6995
Dept. Fax# - (215) 592-3227

ROHM AND HAAS COMPANY

September 15, 1993

FEDERAL EXPRESS
Marsha A. Adams (5HSM-5J)
Responsible Party Search Section
United States Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

RE: Request for Information Pursuant to Section 104(e) of CERCLA for the Stickney Avenue Landfill and the Tyler Street Dump Sites in Toledo, Ohio

Dear Ms. Adams:

This is in response to EPA's Request for Information directed to Plaskon Electronic Materials regarding the above-referenced site.

Plaskon is a wholly-owned subsidiary of Rohm and Haas Company ("RH"). RH did not own, operate or have any relation to Plaskon during the time period cited in the information request (1951-1981). RH acquired Plaskon in 1984 from Plaskon Holding Corporation, at which time RH also acquired the Plaskon Toledo facility (located at 2829 Glendale Ave.), which is now closed.

The Toledo facility had been owned by Allied Chemical Corporation ("Allied") from 1953 to 1979 when Allied sold it to Plaskon Holding Company. Allied had purchased it from Libby-Owens-Ford Glass Company, who owned it since 1943. We have no information as to Plaskon's use of the Stickney Avenue Landfill or the Tyler Street Dump Sites. Enclosed for your information is a copy of our response to EPA's Request for Information concerning the Dura Landfill site, as it includes Allied's Eckhardt survey responses and other waste information concerning the Plaskon Toledo facility.

If you have any questions, please feel free to contact me. Also, kindly direct further Plaskon correspondence to me or Ellen Friedell, Esq. at the above-noted address.

Sincerely,

Audrey C. Friedel

Audrey C. Friedel
Of Counsel

ACF/gam
Enclosure

Attachment 1

cc: Allied Chemical Corporation, Inc. c/o Allied-Signal, Inc., General Counsel Chemicals: Stanley R. Stevinson
Libby Owens Ford Glass Co. c/o Trinova Corporation General Counsel James E. Kline and Libby Owens Ford Co. General Counsel Alan J. Miller
Plaskon Holding Co. c/o Managing Director of Hillside Capital, Inc.,

CABLE ADDRESS ROHMHAAS TELEX 845-247 TWX 710-670-5585 TELECOPIER (215) 592-3377

Direct Dial - (215) 592-6995
Dept. Fax# - (215) 592-322

ROHM AND HAAS COMPANY

VIA FEDERAL EXPRESS

March 15, 1993

Ms. Linda Beasley
Emergency Support Section
U.S. Environmental Protection Agency, HSE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Request for Information Pursuant to Section 104(e) of CERCLA and Section 3007 of RCRA, for the Dura Landfill Site in Toledo, Ohio

Dear Ms. Beasley:

Enclosed is the Response of Plaskon Electronic Materials, Inc. ("Plaskon") to the EPA's Request for Information regarding the above referenced site.

If you have any questions regarding our Response, please feel free to contact me. Also, kindly direct further Plaskon correspondence to me, or Ellen S. Friedell, Esq., at the above-noted address.

Sincerely,

Audrey C. Friedel

Audrey C. Friedel
Of Counsel

ACF/gam
Enclosures

cc: L. B. Nelson
M. R. Yunaska

RESPONSE OF PLASKON ELECTRONIC MATERIALS, INC. TO EPA'S REQUEST FOR INFORMATION REGARDING THE DURA LANDFILL SITE, TOLEDO, OHIO

1. Identify all persons consulted in the preparation of each and every answer to these Information Requests.

Response:

Persons who Respondent had reason to believe had knowledge concerning the use of the Site, were consulted under the direction of Ellen S. Friedell, Esq. of Rohm and Haas Company ("RH"), who traveled to the Toledo, Ohio Plaskon Electronic Materials, Inc. ("Plaskon") facility (the "Toledo facility"), in connection with the City of Toledo's 1987 investigation concerning the Site .

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Response:

There has been a thorough review of the documents identified in connection with the City of Toledo's 1987 investigation concerning the Site (at which time Plaskon employees reviewed the environmental and waste files of the facility under the direction of Ellen S. Friedell, Esq. of RH who traveled to the Toledo facility.) The documents which refer to the subject of this Request are attached as follows:

a. Instructions for Answering Questionnaires prepared by Allied Chemical Corporate Environmental Affairs and Law Departments

b. Memorandum of June 1, 1979 from Wholf to Fitts

c. Memorandum of May 30, 1979 from Mauter regarding Past Practices for Disposal of Waste Materials (with handwriting on it and without handwriting on it)

d. Eckhardt Survey by Allied Chemical Corporation for its various facilities (32 pages)

e Three handwritten note pages of April 30, 1979 identified with the name Kratzman

f. Interoffice Communication of June 5, 1979 to Wholf from von Harling

g. Letter of September 26, 1973 from Findlay to Harantha

h. Photocopy of two news articles (one page.)

i. Memo of April 3, 1973 from Environmental Studies Committee to Chamber Board of Trustees

j. Toledo Area Industrial Solid Waste Summary Report of Survey of April 4, 1973

l. Toledo Operations Combustible Scrap list of June 17, 1968

m. Undated handwritten note (one page)

n. Letter of October 20, 1982 from Wholf to Shields

o. Exhibit C-2 dated July 12, 1984

p. Letter of June 8, 1984 from McKee to Bennett

q. Toledo, Ohio Facility document numbered 450131 (eight pages)

r. Letter of May 18, 1984 from Ferguson to Carlisle

3. If Respondent has reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response:

Allied Chemical Corporation ("Allied") or Plaskon Holding Corporation may be able to provide additional information. By way of background, Plaskon is a wholly-owned subsidiary of RH. RH acquired Plaskon (an epoxy molding business) in 1984 from Plaskon Holding Corporation, at which time RH also acquired the Toledo facility (located at 2829 Glendale Avenue). Our understanding is that the Toledo facility had been owned by Allied from 1953 to 1979, when Allied sold it to Plaskon Holding Company, and that Allied had purchased it from Libby-Owens-Ford Glass Company, who had owned it since 1943. Respondent understands that in the 1960's, when Allied owned the Toledo facility, Allied used the Dura Landfill from 1960-1965.

4. List the EPA Identification Numbers of the Respondent if applicable.

Response:

OHD094808904

5. Identify all end-products (including trade names if appropriate) produced, formulated, processed, manufactured, or otherwise created by each of Respondent's companies, subsidiaries, parent corporations, predecessors, successors, and/or other business entities that generated, used, transported, treated, stored, disposed or otherwise handled hazardous substances, pollutants or contaminants, or solid wastes that may have went to the site between 1950 and 1980. In addition, identify the following:

a. the chemical content, characteristics and physical state (e.g., solid, liquid) of each end-product;

b. the dates during which each end-product was produced, formulated, processed, manufactured, or otherwise created by Respondent;

c. the quantities produced of each end-product;

d. the manufacturing process(es) that generated each end-product. If any such manufacturing or other process has changed or been modified or altered during the period 1950 to 1980, indicate the date and manner of such change, alteration or modification;

e. the wastes or waste byproducts created during or as a result of each of the manufacturing processes listed in the answer to subpart d) above.

Response:

Respondent and its companies, subsidiaries, parent corporations, predecessors, successors, and any other related entities did not generate, use, transport, treat, store, dispose or otherwise handle any hazardous substance, pollutant, contaminant or solid waste that went to the Site. By way of further answer, as to unrelated entities, see documents identified at no. 2 and see no. 3.

6. Identify all hazardous substances, pollutants or contaminants and/or solid wastes purchased, produced, formulated, processed, used, or otherwise handled by each of Respondent's companies, subsidiaries, parent corporations, predecessors, successors, and/or other business entities that generated, used, transported, treated, stored, disposed or otherwise handled hazardous substances, pollutants or contaminants, or solid wastes that may have went to the Site between 1950 and 1980. In addition, identify the following:

a. the chemical composition, characteristics and physical state (e.g., solid, liquid) of each hazardous substance, pollutant or contaminant, or solid waste;

b. the dates during which each hazardous substance, pollutant or contaminant, or solid waste was purchased, produced, formulated, processed, used, or otherwise handled by Respondent;

c. the quantities of each hazardous substance, pollutant or contaminant, or solid waste;

d. how such hazardous substances, pollutants or contaminants, or solid wastes were acquired by Respondent;

e. the manufacturing process that generated and/or used each hazardous substance, pollutant or contaminant, or solid wastes. If any such manufacturing or other process has changed or been modified or altered during the period 1950 to 1980, indicate the date and manner of such change, alteration or modification;

f. the wastes or waste byproducts created in association with the use of such hazardous substance, pollutant or contaminant;

g. the storage and disposal procedures and/or methods used for such hazardous substance, pollutant or contaminant, or waste or waste byproduct identified above.

Response:

Respondent and its companies, subsidiaries, parent corporations, predecessors; successors; and any other related entities did not generate, use, transport, treat, store, dispose or otherwise handle any hazardous substance, pollutant, contaminant or solid waste that went to the Site. By way of further answer, as to unrelated entities, see documents identified at no. 2 and see no. 3.

7. Identify the acts or omissions of any person, other than Respondent's employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site, and damages resulting therefrom.

Response:

See documents identified at no. 2 and see no. 3.

8. Identify all persons or businesses who are or may be responsible for the liabilities of the Respondent arising from or relating to the release or threatened release of hazardous substances or materials or solid wastes at the Site, including but not limited to successors and individuals.

Response:

Respondent has no connection to the Site and therefore has no responsibility or liability relating to the Site. By way of further answer, see documents identified at no. 2 and see no. 3.

9. Identify all persons, including Respondent's employees, having knowledge or information about the generation, use, transportation, treatment, storage, disposal or other handling of materials, hazardous substances, pollutants or contaminants, or solid wastes at or to the Site by you, your contractors, or by prior owners and/operators.

Response:

See no. 3 and documents identified at no. 2.

10. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials, or solid wastes at or to the Site? If the answer to the preceding question is anything but an unqualified "no", identify:

a. the hazardous substance, material, or solid waste;

b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance, material, or solid waste;

c. who supplied you with such hazardous substance, material or solid waste;

d. how such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

e. when such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

f. where such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and

g. the quantity of such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

Response:
No.

11. Identify all persons, including, but not limited to the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of Respondent's hazardous substances, materials, or solid wastes at or to the Site. In addition, identify the following:

a. the hazardous substance or material or solid waste;

b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance or material or solid waste;

c. the process for which each hazardous substance or material or solid waste was used or the process which generated the hazardous substance or material or solid waste;

d. the person(s) with whom Respondent or such other persons made arrangements for disposal or treatment or transportation for disposal or treatment of hazardous substances or materials or solid wastes.

e. the nature and extent of each arrangement that existed between Respondent and each such person;

f. the time period during which each arrangement existed between Respondent and each such person;

g. where such hazardous substance or material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

h. the date of every transaction on which each hazardous substance or material or solid waste was so transported to or accepted for transport at or to the Site;

i. the quantity (weight or volume) of such hazardous substance or material or solid waste involved in each transaction and the total quantity for all transactions;

j. all tests, analyses, and analytical results concerning the hazardous substances, materials or solid waste;

k. the amount paid in connection with each transaction, the method of payment, and the identity of the person making the payment;

l. the person(s) who selected the Site as the place where the hazardous substances, materials or solid would be disposed;

m. where the person identified in subpart l) above, intended to have such hazardous substances, materials or solid waste transported and all evidence of this intent;

n. whether the hazardous substances, materials or hazardous waste involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;.

o. what was actually done to the hazardous substances, materials or solid wastes once they were brought to the Site;

p. the final disposition of each of the hazardous substances, materials or solid waste involved in such transactions;

q. the measures taken by Respondent to determine the actual methods, means, and site of treatment or disposal of the hazardous substances, materials or solid waste involved in each transaction;

r. the type and number of containers in which the hazardous substances, materials or solid waste were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;

s. the price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of hazardous substance or material or solid waste brought to the Site.

Response:

There was no arrangement for disposal, treatment, or transportation of hazardous substance, materials, or solid wastes of Respondent, in connection with the Site. As to others, see documents identified at no. 2 and see no. 3.

12. Produce all documents relating to the transportation, delivery, treatment, storage, disposal, or handling of materials, hazardous substances, pollutants or contaminants, or solid waste at or to the Site, including but not limited to the following:

a. manifests, shipping records, logs or other records regarding the transportation, delivery, shipment, disposal or handling of hazardous substances, materials or solid wastes to or at the Site;

b. all invoices, evidence of payment, and other records relating to billing for the transportation, delivery, shipment, disposal or handling of hazardous substances, materials or solid waste to or at the Site.

Response:

Respondent did not transport, deliver, treat, store, dispose or handle materials, hazardous substances, pollutants, contaminants or solid waste at or to the Site. As to others' involvement in connection with the Site, see documents identified at no. 2.

13. Identify all liability insurance policies held by Respondent from 1950 to 1980. In identifying such policies, state the name and address of each insurer and of the insured; the amount of coverage under each policy, the commencement and expiration dates for each policy, whether the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents. In lieu of providing this information, Respondent may submit complete copies of all relevant insurance policies.

Response:

Respondent has numerous insurance policies and, if necessary, will make such policies available for inspection and copying at a mutually convenient time.

14. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

Response:

It is very burdensome and expensive for Respondent to provide the requested tax returns, especially given Respondent's lack of connection with the Site as set forth in this Response. . By way of further answer, RH (the parent company of Plaskon as set forth above) is a Fortune 500 Company, and its financial information is filed with, and readily available,

at the Securities and Exchange Commission. Further, nothing in the tax returns would shed light on the subject of this Request for Information.

15. If Respondent is a Corporation, respond to the following requests:

a. provide a copy of the Articles of Incorporation and By-Laws of the Respondent.

b. provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service.

c. identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.

Response:

It is very burdensome and expensive for Respondent to provide the requested corporate information, especially given Respondent's lack of connection with the Site as set forth in this Response. By way of further answer, RH (the parent company of Plaskon, as set forth above), is a Fortune 500 Company, and its financial information is filed with and readily available at the Securities and Exchange Commission. Further, nothing in the requested corporate information would shed light on the subject of this Request for Information.

16. If Respondent is a Partnership, provide copies of the Partnership Agreement.

Response:

Not applicable.

17. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

Response:

Not applicable.

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

AFFIDAVIT IN SUPPORT OF

ANSWERS TO REQUEST FOR INFORMATION

I hereby affirm and certify, under penalty of perjury, that I am Senior Counsel of Rohm and Haas Company. As such I am authorized to certify that the following facts are true to the best of my knowledge, information and belief:

a. I have personally examined and am familiar with the information provided herein in response to the EPA's Request for Information.

b. All the answers contained herein are true, complete and accurate to the best of my information and belief.

c. All documents herein are complete and authentic to the best of my knowledge and information, unless otherwise indicated.

d. In the preparation of the responses herein and/or through prior inquiry relating to the City of Toledo's investigation of the Site, I have contacted and discussed the issues contained in the requests with all present and former employees and agents whom I have reason to believe may have been familiar with any information concerning the shipment of any materials to the Dura site and with any of the issues and questions contained in this request.

e. In preparation of the responses herein and/or through prior inquiry relating to the City of Toledo's investigation of the Site, a diligent record search has been completed.

Ellen S. Friedell

ELLEN S. FRIEDELL

Sworn to and Subscribed before me

this 15th day of March , 1993.

Notary Public

My commission expires:

NOTARIAL SEAL
[illegible] FISCHER, Notary Public
City of Philadelphia, Phila County
My Commission Expires December 3, 1995

SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS

OF

U. S. HOUSE COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE

INVESTIGATION

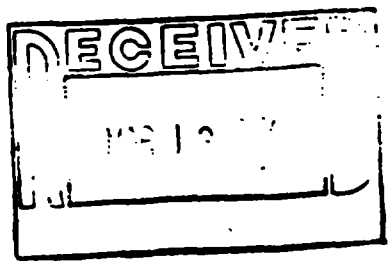
OF

CHEMICAL PROCESS WASTE DISPOSAL PRACTICES

INSTRUCTIONS

FOR ANSWERING

QUESTIONNAIRES



Prepared by Allied Chemical Corporate

Environmental Affairs and Law Departments

May 4, 1979

On April 18, 1979, the United States House of Representatives Subcommittee on Oversight and Investigations (the "SOI") of the Committee on Interstate and Foreign Commerce sent a request to John T. Conner, Chairman of the Board, and to 49 other major chemical companies for information concerning the disposal of chemical process wastes since 1950. The request is part of an SOI investigation of problems associated with the disposal of industrial waste materials.

In its request, the SOI asks for a great deal of information which must be submitted in a relatively short time, i.e. by June 29, 1979.

This project will require much time and effort on the part of Company personnel and will involve the expenditure of many thousands of dollars. As a good corporate citizen Allied Chemical will make a good faith effort to honor the SOI request. We wish to cooperate with and assist the SOI in its legislative efforts concerning past waste disposal practices.

Several of the people who helped prepare these instructions attended the April 27, 1979 SOI staff conference for representatives of the 50 companies to whom the requests were sent. During the conference, the SOI staff helped to clarify a number of the ambiguities which the SOI questionnaire presented. These instructions were prepared in the light of those clarifications. They are also based upon some interpretations which the preparers believed to be reasonable.

General Instructions

1. The Forms

You have received a copy of the four Forms - A, B, C and D - which make up the SOI questionnaire, as well as some brief SOI instructions on filling out the forms. This copy should be used as the master from which you can make any number of clean copies you need.

2. Questions Concerning the Forms

If you have any questions concerning these Instructions or the Forms, please direct them to the following persons in Morristown:

J. O. (Jim) Garrison	(201) 455-4294
E. J. (Ed) Shields	(201) 455-5630
H. J. (Harry) Wallum	(201) 455-3382
A. J. (Tony) Stewart	(201) 455-4033

These people will either be able to answer your questions, or, if they are not, they will contact the SOI staff for answers. In this way, the Company will be able to maintain consistency in answering the questions which the SOI staff has requested. For the same reason, the telephone number sought in the preamble for Form A for the person completing the Form will always be the telephone number of J. O. Garrison in Morristown so that the central office will know the questions the SOI staff is asking concerning the questionnaire.

3. A Good Faith, Good Judgement Effort

It is the Company's intent that we will make a good faith effort to answer the questions posed. This means that we will make a strong effort to answer the questions accurately and as completely as we can, given the short time span for responding.

Those filling out the forms should remember that a good faith effort includes the exercise of good judgement. While the SOI will expect us to be diligent in the pursuit of facts, it recognizes that time limitations will not permit us to leave no stone unturned to get the answers.

For example, in many, if not most cases, we will not have records covering waste disposal going back thirty years. This will require that we ask older employees what they recall concerning practices that go "way back". Good faith dictates that we should contact Company retirees who live in the community to see if they can be helpful. Good judgement, however, would suggest that it is not feasible to track down retirees all over the globe. We believe that the exercise of good judgement is also the exercise of good faith.

4. Additional Explanations

If you believe that the answer to any question requires a further explanation, please type the explanation on a separate sheet of paper, referencing the Form and Item Number and attach the explanation to the appropriate form.

5. Errata

Attached hereto is a list of errata on the Forms. Please take a moment to correct these errors before you fill out the Forms.

6. Submission to Division Coordinators

Drafts of all completed forms must be submitted to your Division Environmental Coordinators by June 8, 1979. They will then be reviewed by the Division, submitted for final collation by the Corporate Task Force assigned to this project, and then submitted to the SOI.

Detailed Instructions

Form A: General Facility Information

One Form A must be completed for your location.

Company Name:	Insert "Allied Chemical Corporation" (Do not include the Division name)
Facility Name:	Insert the full name of your location (e.g. "Baker & Adamson Works" not "B & A Works"
Address:	Insert both street address and P.O. Box number on line indicated.
Name and Position of Person Completing Form:	Insert the name and position of the Senior Plant, Regional, or Division Pollution Control person assigned the final responsibility for assuring the survey forms are correctly and completely executed.
Phone Number:	Insert (201) 455-4294. This is Jim Garrison's Morristown office number. Jim will serve as Allied Chemical's point of contact for the subcommittee.
Item 1:	Insert the year Allied Chemical began operating the facility after Allied Chemical acquired it. Allied Chemical Corporation was incorporated in 1920 as "Allied Chemical and Dye Corporation". Thus "1920" is the earliest date to be inserted here.
Item 2:	Facilities with more than one primary (4 digit) SIC Code - for example, if the location has a sulfuric plant (SIC Code 2819) and a genetron plant (SIC Code 2869) - should list the additional codes directly under the one for which the box is provide A partial listing of SIC Codes is attache for reference.

Item 3:

- Note that the total amount of process wastes disposed of in 1978 is to be inserted.
- Do not include any wastes sent to a publicly owned treatment works, or covered under an NPDES permit (except for treatment plant sludges and wastes disposed of via deep wells, ocean dumping or land-farming).
- Do include treatment plant sludges, and wastes which were disposed of in the ocean, by deep well, or by land-farming.
- Do not include wastes which left the plant as emissions into the air.
- Do include wastes and rubble from demolition operations conducted at your location.
- Do not include office, laboratory, pilot plant, research facility, or warehouse wastes.
- Do not include empty drums, empty bags, empty cardboard boxes, or other empty containers (whether or not they previously contained process chemicals or wastes).
- All included wastes are to be reduced to tons if possible; otherwise to either gallons or cubic yards whichever is more convenient. The purpose of this is to permit estimation of a percentage for Item 4.
- If the total 1978 wastes included add up to less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0"; if 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.

Item 4:

- This item is to be completed for those wastes listed in units of hundred tons in Item 3. If you are unable to convert all wastes to tons, indicate on the back of Form A how the waste listed by 1,000 gallons (or 1,000 cubic yards) in Item 3 was disposed of.
- If the percentage disposed of by a listed means is less than 0.5%, insert "0". Again, all numbers are to be rounded off to the nearest unit as in Item 3.
- If a listed means of disposal was not used, simply insert a dash (-).
- "Reprocessed/Recycled" means only material that we give away or pay to have hauled away, and which is believed to be recycled or recovered in whole or in part by another party (i.e. not Allied Chemical). It does not include any materials which we sell.
- If more than one "other" means of disposal was used (e.g. land-farming, ocean dumping, etc.), all means of disposal should be set forth in the space provided, but only the combined percentage should be reported in the box provided.

Item 5: Self explanatory.

Item 6: The period covered by this question is since 1950. If Allied Chemical purchased your location or any part of your location since 1950, and also received the records of the seller or hired any former employees of the seller, then the effort should be made to cover the period from 1950 to present wherever called for in the forms.

Item 7: Self explanatory.

Item 8: Self explanatory. Important note - make sure that either the originals or photocopies of all source documents utilized are easily retrievable.

Item 9: "Employees" means current long-service employees of the facility. Retired employees may be contacted if there is good reason to believe they may have pertinent knowledge not possessed by current employees. Important note - all interviews should be documented showing date, time, place, interviewer, interviewee, questions asked and answers provided. The purpose of the interview should be explained to each employee questioned.

Form B: Disposal Site Information

One Form B must be completed for each known site at which process wastes from your location were disposed of since 1950. If any such wastes were disposed of at your location, one Form B must be completed for your location. If any such wastes were disposed at another Allied Chemical facility, one Form B must be completed for such facility. Also one Form B must be completed for each known off-plant site at which such wastes were disposed of. Do not complete a Form B for wastes disposed of by discharge to a publicly owned treatment works.

Company Name: Insert "Allied Chemical Corporation" only.

Facility Name: Insert the full name of your location as reported on Form A.

Name of Site:

- Insert the name of the disposal site.
- For disposal sites located on the same property as your plant, list the name of your location (same entry as facility name above).

Address of Site: Insert the street address of the disposal site. Do not use Post Office Box number in lieu of street address, unless there is no street address known.

Name of Owner: and Current Owner: Give street address if possible. However, Post Office Box number may be used if street address is not known.

Item 1: Self explanatory.

Item 2: Insert the proper code number as follows:

Code 1 = Allied Chemical Ownership
Code 2 = Private ownership other than Allied Chemical
Code 3 = Public ownership (City, State, County, Municipality or an authority created by a Governmental body)
Code 9 = Don't know

Item 3:

- Insert the proper code number as follows:

  Code 1 = Closed
  Code 2 = Still Open
  Code 9 = Don't Know

- For the date of site closure - if the disposal site is now closed, but the year of closure is unknown, insert your best estimate of the year closed and put "estimated" on the dotted line to the left of the box.

Item 4:

The answer should show the year the disposal site was first used by the facility under Allied Chemical ownership or control. If uncertain, insert your best estimate and put the word "estimated" on the dotted line to the left of the box.

Item 5:

If uncertain of date, insert best estimate and put the word "estimated" on the dotted line to the left of the box

Item 6:

- This includes only wastes from your plant which were disposed of from 1950 to date at the particular site for which the Form 3 is being completed.

- More than one type of unit may be used in completing this item. However, do not count the same waste twice (e.g. as 1,000 gallons and 100 tons).

- If the wastes at your location from 1950 to date total less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0" in the boxes provided and indicate the actual amounts on the dotted line to the left of the appropriate box. If 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.

- Do <u>not</u> include wastes which left the plant as emissions into the air.

- Do include wastes and rubble from demolition operations conducted at your location.

- Do not include office, laboratory, pilot plant, research facility, or warehouse wastes.

- Do not include empty drums, empty bags, empty containers (whether or not they previously contained process chemicals or wastes).

- If the Form B is being completed for Disposal at your own location, do not include any wastes sent to a publicly owned treatment works, or covered under an NPDES permit (except do include treatment plant sludges and wastes disposed of on site via deep wells, or land-farming).

Item 7:

- This item refers to the means of disposal available at the site, not just the means of disposal used for the wastes from your location.

- One of the following code numbers must be inserted in each of the blocks, (42) through (52):

  Code 1 = Currently in Use
  Code 2 = No Longer in Use
  Code 3 = Never Used
  Code 9 = Don't Know

Item 8:

- One of the following code numbers must be inserted in the box provided.

  Code 1 = Your location only.
  Code 2 = Your location and other Allied Chemical facilities only.
  Code 3 = Allied Chemical and other generators of waste.
  Code 9 = Don't know if generators of waste other than Allied Chemical used the site.

- In the space provided list the names of other Allied Chemical locations using the site for disposal. Also list any other users, but only if known from your own records or from the recollections of your employees.

- If the disposal site covered by the Form B is a publicly owned site (e.g. a municipal landfill it is not necessary to list all known users. However, the types of users should be listed, if known.

Page 2 of Form B

Make sure that pages 1 and 2 of Form B are stapled together when submitted.

Company Name:

Insert "Allied Chemical Corporation" only.

Facility Name:

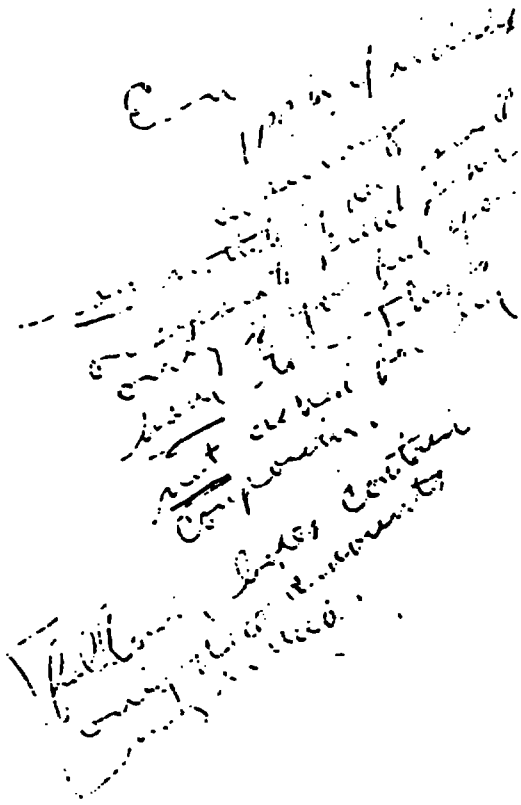
Insert the name of your location as reported on page 1 of Form B and on Form A.

Site Name:

The name of the disposal site covered by this form (as reported on page 1 of Form B.

Item 9:

- Note that a code number must be inserted in every block, (10) through (68).
- Code 1 = "present in waste". For purposes of this survey, Code 1 should be used where the component or waste type described is known to be in the waste disposed of at this site. The word "present" includes previous analytical detection of the constituent at any level in the waste, or which your are reasonably certain is in the wastes. Note: The wastes do not have to be tested or retested for purposes of completing this form.
- Code 2 = "not present in waste". For purposes of this survey, Code 2 should be used when the component has been analyzed for and found to be non-detectable in the waste disposed of, or when you are reasonably certain the specific type of waste is clearly not involved.
- Code 3 = "don't know" should be used in all cases where Code 1 or Code 2 cannot be used.
- The indented components or characteristics in the list are sub-categories of the waste type they are listed under. Any descriptive characteristics of the main category apply to the indented items. For example, a neutralized (to pH 5-6) plating waste is not the waste type covered by block (12). However, a plating waste with a pH of 2 would be.
- Halogenated aliphatics (Block 39) and halogenated aromatics (Block 40) are the same as solvents halogenated aliphatic (Block 51) and solvents halogenated aromatic (Block 52). Nevertheless, fill in all four blocks with the proper code number.



- Block 20 - Heavy metals and trace metals - the parenthetical expression should read "bonded organically or inorganically" (or not and).

Form C: Hauler Information

Only one Form C is to be completed, and this only if process wastes were removed from your location since 1950.

Company Name:	Insert "Allied Chemical Corporation"
Facility Name:	Insert the name of your location, the same as reported on Forms A & B.
Names and Addresses of Firms or Contractors:	Provide as complete information as possible. Give both street address and P.O. Box number if known.

Form D: Supplemental Hauler Information

One Form D must be completed for each hauler serving your location who hauled wastes to an unknown disposal site.

Company Name:	Insert "Allied Chemical Corporation".
Facility Name:	Insert the name of your location as reported on Forms A, B & C.
Name of Hauling Firm/Contractor:	The business or corporate name used by the hauler.
Address (of Hauling Firm/Contractor):	Provide as complete information as possible. Give both street address and P.O. Box if known.
Item 1:	The answer should show the year the waste hauler was first used by the facility under Allied Chemical ownership or control. If uncertain, insert your best estimate and put the word "estimated" on the dotted line to the left of the box.
Item 2:	If uncertain of date, the hauler was last used by your location, give best estimate and insert the word "estimated" on the dotted line to the left of the box.
Item 3:	o This includes only the wastes from your site which were hauled by a hauler from 1950 to date to a disposal site unknown to you. o More than one type of unit may be used in completing this item. However, do not count the same waste twice (e.g. 1,000 gallons and 100 tons). o Do include wastes and rubble from demolition operations conducted at your location. o Do not include office, laboratory, pilot plant, research facility, or warehouse wastes. o Do not include empty drums, empty bags, empty carboard boxes- or other empty containers (whether or not they previously contained process chemicals or wastes).

- If the wastes from 1950 to date total less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0" ; if 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.

Item 4:

- Note that a code number must be inserted in every block, (37) through (79) and (10) through (25).

- Code 1 = "present in waste". For purposes of this survey, Code 1 should be used where the component or waste type described is known to be in the waste removed from your location by this hauler. The word "present" includes previous analytical detection of the constituent at any level in the waste. Note: The wastes do not have to be tested or re-tested for purposes of answering this form.

- Code 2 = "not present in waste". For purposes of this survey, Code 2 should be used only when the component has been analyzed for and found to be non-detectable in the waste disposed of, or when the specific type of waste is clearly not involved.

- Code 3 = "don't know" should be used in all cases where Code 1 or Code 2 cannot be used with reasonable certainty.

- The indented components or characteristics in the list are sub-categories of the waste type they are listed under. Any descriptive characteristics of the main category apply to the indented items. For example, a neutralized (to pH 5-6) plating waste is not the waste type covered by block (39). However, a plating waste with a pH of 2 would be.

- Halogenated aliphatics (Block 66) and halogenated aromatics (Block 67) are the same as solvents halogenated aliphatic (Block 78) and solvents halogenated aromatic (Block 79). Nevertheless, fill in all four blocks with the proper code number.

- Block 47 - Heavy metals and trace metals - the parenthetical expression should read "bonded organically or inorganically" (or not and).

ERRATA

- The following changes should be made on Form B, question 9 and Form D, question 4:

  1. "Base solutions, with pH 10" should read: "Base solutions, with pH 12";

  2. "Radioactive residues 3 pico curies/liter" should read: "Radioactive residues 50 pico curies/gram";

  3. Under organics, the first item "pesticides & intermediates" should read "insecticides & intermediates";

  4. Under organics, "solvents protic (except water)" should read "solvents polar (except water)"; and

  5. Under organics, "other solvents nonprotic" should read "other solvents nonpolar."

Point Source Categories

1. *TIMBER PRODUCTS PROCESSING*
   - SIC 2411 - Logging Camps and Logging Contractors (Camps Only)
   - SIC 2421 - Saw Mills and Planing Mills, General
   - SIC 2426 - Hardwood Dimension and Flooring Mills
   - SIC 2429 - Special Purpose Sawmills, Not Elsewhere Classified
   - SIC 2431 - Millwork
   - SIC 2434 - Wood Kitchen Cabinets
   - SIC 2435 - Hardwood Veneer and Plywood
   - SIC 2436 - Softwood Veneer and Plywood
   - SIC 2439 - Structural Wood Members, Not Elsewhere Classified
   - SIC 2491 - Wood Preserving
   - SIC 2499 - Wood Products, Not Elsewhere Classified (Furniture Mills)
   - SIC 2661 - Building Paper and Building Board Mills (Hardboard Only)

2. *STEAM ELECTRIC POWER PLANTS*
   - SIC 4911 - Electric Services (Limited to Steam-Electric Power Plants)

3. *LEATHER TANNING AND FINISHING*
   - SIC 31 - Leather and Leather Products

4. *IRON AND STEEL MANUFACTURING*
   - SIC 3312 - Blast Furnaces (Including Coke Ovens), Steel Works and Rolling Mills.
   - SIC 3313 - Electrometallurgical Products.
   - SIC 3315 - Steel Wire Drawing and Steel Nails and Spikes.
   - SIC 3316 - Cold Rolled Steel Sheet, Strip and Bars.
   - SIC 3317 - Steel Pipe and Tubes.

5. *PETROLEUM REFINING*
   - SIC 2911 - Petroleum Refining (Including 1) Topping Plant; 2) Topping and Cracking Plants; 3) Topping, Cracking and Petro-chemical Plants; 4) Integrated Plants; and, 5) Integrated and Petro-chemical Plants)

6. *INORGANIC CHEMICALS MANUFACTURING*
   - SIC 2812 - Alkalies and Chlorine
   - SIC 2813 - Industrial Gasses
   - SIC 2816 - Inorganic Pigments
   - SIC 2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified

7. *TEXTILE MILLS*
   - SIC 22 - Textile Mill Products
   - SIC 23 - Apparel and Other Finished Products Made from Fabrics and Similar Materials

8. *ORGANIC CHEMICALS MANUFACTURING*
   - SIC 2865 - Cyclic (Coal Tar) Crudes, and Cyclic Intermediates, Dyes, and Organic Pigments (Lakes and Toners)

9. *NONFERROUS METALS MANUFACTURING*
   - SIC 2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified (Bauxite Refining Only)
   - SIC 3331 - Primary Smelting and Refining of Copper
   - SIC 3332 - Primary Smelting and Refining of Lead
   - SIC 3333 - Primary Smelting and Refining of Zinc
   - SIC 3334 - Primary Production of Aluminum
   - SIC 3339 - Primary Smelting and Refining of Nonferrous Metals, Not Elsewhere Classified
   - SIC 3341 - Secondary Smelting and Refining of Nonferrous Metals

10. *PAVING AND ROOFING MATERIALS (TARS AND ASPHALT)*
   - SIC 2951 - Paving Mixtures and Blocks
   - SIC 2952 - Asphalt Felts and Coatings
   - SIC 3996 - Linoleum, Asphalted-Felt-Base, and Other Hard Surface Floor Coverings, Not Elsewhere Classified

11. *PAINT AND INK FORMULATION AND PRINTING*
   - SIC 2711 - Newspapers: Publishing, Publishing and Printing
   - SIC 2721 - Periodicals: Publishing, Publishing and Printing
   - SIC 2731 - Books: Publishing, Publishing and Printing
   - SIC 2732 - Book Printing
   - SIC 2741 - Miscellaneous Publishing
   - SIC 2751 - Commercial Printing, Letterpress and Screen
   - SIC 2752 - Commercial Printing, Letterpress and Lithographic
   - SIC 2753 - Engraving and Plate Printing
   - SIC 2754 - Commercial Printing, Gravure
   - SIC 2761 - Mainfold Business Forms
   - SIC 2771 - Greeting Card Publishing
   - SIC 2795 - Photoengraving
   - SIC 2794 - Electrotyping and Stereotyping
   - SIC 2795 - Lithographic Platemaking and Related Services
   - SIC 2851 - Paints, Varnishes, Lacquers, Enamels, and Allied Products
   - SIC 2893 - Printing Ink
   - SIC 3951 - Pens, Mechanical pencils, and Parts and Stamp Pads (Inked Materials Only)
   - SIC 3952 - Lead Pencils, Crayons, and Artists' Materials
   - SIC 3955 - Carbon Paper and Inked Ribbons

12. *SOAP AND DETERGENT MANUFACTURING*
   - SIC 2841 - Soap and Other Detergents, except Specialty Cleaners

13. *AUTO AND OTHER LAUNDRIES*

SIC 7211 - Power Laundries, Family and Commercial
SIC 7213 - Linen Supply
SIC 7214 - Diaper Service
SIC 7215 - Coin-operated Laundries and Dry Cleaning
SIC 7216 - Dry Cleaning Plants, Except Rug Cleaning
SIC 7217 - Carpet and Upholstery Cleaning
SIC 7218 - Industrial Laundries
SIC 7219 - Laundry and Garment Services, Not Elsewhere Classified
None - Auto Wash Establishments

14. *PLASTIC AND SYNTHETIC MATERIALS MANUFACTURING*

SIC 282 - Plastic Materials and Synthetic Resins, Synthetic and Other Manmade Fibers, except Glass

15. *PULP AND PAPERBOARD MILLS AND CONVERTED PAPER PRODUCTS*

SIC 2611 - Pulp Mills
SIC 2621 - Paper Mills, except Building Paper Mills
SIC 2631 - Paperboard Mills
SIC 2641 - Paper Coating and Glazing
SIC 2642 - Envelopes
SIC 2643 - Bags, Except Textile Bags
SIC 2645 - Die-Cut Paper and Paperboard and Cardboard
SIC 2646 - Pressed and Molded Pulp Goods
SIC 2647 - Sanitary Paper Products
SIC 2648 - Stationery, Tablets, and Related Products
SIC 2649 - Converted Paper and Paperboard Products, Not Elsewhere Classified
SIC 2651 - Folding Paperboard Boxes
SIC 2652 - Set-up Paperboard Boxes
SIC 2653 - Corrugated and Solid Fiber Boxes
SIC 2654 - Sanitary Food Containers
SIC 2655 - Fiber Cans, Tubes, Drums, and Similar Products
SIC 2661 - Building Paper and Building Board Mills
SIC 2782 - Blankbooks, Looseleaf Binders and Devices

16. *RUBBER PROCESSING*

SIC 2822 - Synthetic Rubber (Vulcanizable Elastomers)
SIC 2891 - Rubber Cement
SIC 3011 - Tires and Inner Tubes
SIC 3021 - Rubber and Plastics Footwear (Rubber Only)
SIC 3031 - Reclaimed Rubber
SIC 3041 - Rubber and Plastics Hose and Belting (Rubber Only)
SIC 3069 - Fabricated Rubber Products, Not Elsewhere Classified
SIC 3293 - Gaskets, Packing, and Sealing Devices (Rubber Packing Only)

17. *MISCELLANEOUS CHEMICALS*

SIC 2831 - Biological Products
SIC 2833 - Medicinal Chemicals and Botanical Products
SIC 2834 - Pharmaceutical Preparations
SIC 2861 - Gum and Wood Chemicals
SIC 2879 - Pesticides and Agricultural Chemicals, Not Elsewhere Classified
SIC 2891 - Adhesive and Sealants
SIC 2892 - Explosives
SIC 2895 - Carbon Black
SIC 2899 - Chemicals and Chemical Preparation, Not Elsewhere Classified
SIC 3861 - Photographic Equipment and Supplies

18. *MACHINERY AND MECHANICAL PRODUCTS MANUFACTURING*

SIC 3021 - Rubber and Plastics Footwear (Balance)
SIC 3041 - Rubber and Plastics Hose and Belting (Balance)
SIC 3079 - Miscellaneous Plastics Products
SIC 3293 - Gaskets, Packing, and Sealing Devices (Balance)
SIC 3321 - Gray Iron Foundries
SIC 3322 - Malleable Iron Foundries
SIC 3324 - Steel Investment Foundries
SIC 3325 - Steel Foundries, Not Elsewhere Classified
SIC 3351 - Rolling, Drawing, and Extruding of Copper
SIC 3353 - Aluminum Sheet, Plate, and Foil
SIC 3354 - Aluminum Extruded Products
SIC 3355 - Aluminum Rolling and Drawing, Not Elsewhere Classified
SIC 3356 - Rolling, Drawing, and Extruding of Nonferrous Metals, except copper and aluminum

SIC 3357 - Drawing and Insulating of Nonferrous Wire
SIC 3361 - Aluminum Foundries (Castings)
SIC 3362 - Brass, Bronze, Copper, Copper Base Alloy Foundries (Castings)
SIC 3369 - Nonferrous Foundries (Castings), Not Elsewhere Classified
SIC 3398 - Metal Heat Treating
SIC 3399 - Primary Metal Products, Not Elsewhere Classified
SIC 3411 - Metal Cans
SIC 3412 - Metal Shipping Barrels, Drums, Kegs, and Pails
SIC 3421 - Cutlery
SIC 3423 - Hand and Edge Tools, Except Machine Tools and Hand Saws
SIC 3425 - Hand Saws and Saw Blades
SIC 3429 - Hardware, Not Elsewhere Classified
SIC 3431 - Enameled Iron and Metal Sanitary Ware
SIC 3432 - Plumbing Fixture Fittings and Trim (Brass Goods)
SIC 3433 - Heating Equipment, Except Electric and Warm Air Furnaces
SIC 3441 - Fabricated Structural Metal
SIC 3442 - Metal Doors, Sash, Frames, Molding, and Trim
SIC 3443 - Fabricated Platework (Boiler Shops)
SIC 3444 - Sheet Metal Work
SIC 3446 - Architectural and Ornamental Metal Work
SIC 3448 - Prefabricated Metal Buildings and Components
SIC 3449 - Miscellaneous Metal Work
SIC 3451 - Screw Machine Products
SIC 3452 - Bolts, Nuts, Screws, Rivets, and Washers
SIC 3462 - Iron and Steel Forgings
SIC 3463 - Nonferrous Forgings
SIC 3465 - Automotive Stampings
SIC 3466 - Crowns and Closures
SIC 3469 - Metal Stampings, Not Elsewhere Classified
SIC 3482 - Small Arms Ammunition
SIC 3483 - Ammunition, Except for Small Arms, Not Elsewhere Classified
SIC 3484 - Small Arms
SIC 3489 - Ordnance and Accessories, Not Elsewhere Classified
SIC 3493 - Steel Springs, Except Wire
SIC 3494 - Valves and Pipe Fittings, Except Plumbers' Brass Goods
SIC 3495 - Wire Springs
SIC 3496 - Miscellaneous Fabricated Wire Products
SIC 3497 - Metal Foil and Leaf
SIC 3498 - Fabricated Pipe and Fabricated Pipe Fittings
SIC 3499 - Fabricated Metal Products, Not Elsewhere Classified
SIC 3511 - Steam, Gas, and Hydraulic Turbines and Turbine Generator Set Units
SIC 3519 - Internal Combustion Engines, Not Elsewhere Classified
SIC 3523 - Farm Machinery and Equipment
SIC 3524 - Garden Tractors and Lawn and Garden Equipment
SIC 3531 - Construction Machinery and Equipment
SIC 3532 - Mining Machinery and Equipment, Except Oil Field Machinery and Equipment
SIC 3533 - Oil Field Machinery and Equipment
SIC 3534 - Elevators and Moving Stairways
SIC 3535 - Conveyors and Conveying Equipment
SIC 3536 - Hoists, Industrial Cranes, and Monorail Systems
SIC 3537 - Industrial Trucks, Tractors, Trailers, and Stackers
SIC 3541 - Machine Tools, Metal Cutting Types
SIC 3542 - Machine Tools, Metal Forming Types
SIC 3544 - Special Dies and Tools, Die Sets, Jigs and Fixtures and Industrial Molds
SIC 3545 - Machine Tool Accessories and Measuring Devices
SIC 3546 - Power Driven Hand Tools
SIC 3547 - Rolling Mill Machinery and Equipment
SIC 3549 - Metalworking Machinery, Not Elsewhere Classified
SIC 3551 - Food Products Machinery
SIC 3552 - Textile Machinery
SIC 3553 - Woodworking Machinery
SIC 3554 - Paper Industries Machinery

SIC 3553 - Printing Trades Machinery and Equipment
SIC 3559 - Special Industry Machinery, Not Elsewhere Classified
SIC 3561 - Pumps and Pumping Equipment
SIC 3562 - Ball and Roller Bearings
SIC 3563 - Air and Gas Compressors
SIC 3564 - Blowers and Exhaust and Ventilation Fans
SIC 3565 - Industrial Patterns
SIC 3566 - Speed Changers, Industrial High Speed Drives, and Gears
SIC 3567 - Industrial Process Furnaces and Ovens
SIC 3568 - Mechanical Power Transmission Equipment, Not Elsewhere Classified
SIC 3569 - General Industrial Machinery and Equipment, Not Elsewhere Classified
SIC 3572 - Typewriters
SIC 3573 - Electronic Computing Equipment
SIC 3574 - Calculating and Accounting Machines, Except Electronic Computing Equipment
SIC 3576 - Scales and Balances, Except Laboratory
SIC 3579 - Office Machines, Not Elsewhere Classified
SIC 3581 - Automatic Merchandising Machines
SIC 3582 - Commercial Laundry, Dry Cleaning, and Pressing Machines
SIC 3585 - Air Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment
SIC 3586 - Measuring and Dispensing Pumps
SIC 3589 - Service Industry Machines, Not Elsewhere Classified
SIC 3592 - Carburetors, Piston, Piston Rings, and Valves
SIC 3599 - Machinery, Except Electrical, Not Elsewhere Classified
SIC 3612 - Power, Distribution, and Specialty Transformers
SIC 3613 - Switchgear and Switchboard Apparatus
SIC 3621 - Motors and Generators
SIC 3622 - Industrial Controls
SIC 3623 - Welding Apparatus, Electric
SIC 3624 - Carbon and Graphite Products
SIC 3629 - Electrical Industrial Apparatus, Not Elsewhere Classified
SIC 3631 - Household Cooking Equipment
SIC 3632 - Household Refrigerators and Home and Farm Freezers
SIC 3633 - Household Laundry Equipment
SIC 3634 - Electric Housewares and Fans
SIC 3635 - Household Vacuum Cleaners
SIC 3639 - Household Appliances, Not Elsewhere Classified
SIC 3641 - Electric Lamps
SIC 3643 - Current-Carrying Wiring Devices
SIC 3644 - Noncurrent-Carrying Wiring Devices
SIC 3645 - Residential Electric Lighting Fixtures
SIC 3646 - Commercial, Industrial, and Institutional Electric Lighting Fixtures
SIC 3647 - Vehicular Lighting Equipment
SIC 3648 - Lighting Equipment, Not Elsewhere Classified
SIC 3651 - Radio and Television Receiving Sets, Except Communication Types
SIC 3652 - Phonograph Records and Pre-recorded Magnetic Tape
SIC 3661 - Telephone and Telegraph Apparatus
SIC 3662 - Radio and Television Transmitting, Signaling, and Detection Equipment and Apparatus
SIC 3671 - Radio and Television Receiving Type Electron Tubes, Except Cathode Ray
SIC 3672 - Cathode Ray Television Picture Tubes
SIC 3673 - Transmitting, Industrial, and Special Purpose Electron Tubes
SIC 3674 - Semiconductors and Related Devices
SIC 3675 - Electronic Capacitors
SIC 3676 - Resistors, for Electronic Applications
SIC 3677 - Electronic Coils, Transformers and Other Inductors
SIC 3678 - Connectors, for Electronic Applications
SIC 3679 - Electronic Components, Not Elsewhere Classified

SIC 3691 - Storage Batteries
SIC 3692 - Primary Batteries, Dry and Wet
SIC 3693 - Radiographic X-ray, Fluoroscopic X-ray, Therapeutic X-ray and Other X-ray Apparatus and Tubes; Electromedical and Electrotherapeutic Apparatus
SIC 3694 - Electrical Equipment for Internal Combustion Engines
SIC 3699 - Electrical Machinery, Equipment, and Supplies, Not Elsewhere Classified
SIC 3711 - Motor Vehicles and Passenger Car Bodies
SIC 3713 - Truck and Bus Bodies
SIC 3714 - Motor Vehicle Parts and Accessories
SIC 3715 - Truck Trailers
SIC 3721 - Aircraft
SIC 3724 - Aircraft Engines and Engine Parts
SIC 3728 - Aircraft Parts and Auxiliary Equipment, Not Elsewhere Classified
SIC 3731 - Ship Building and Repairing
SIC 3732 - Boat Building and Repairing
SIC 3743 - Railroad Equipment
SIC 3751 - Motorcycles, Bicycles, and Parts
SIC 3761 - Guided Missiles and Space Vehicles
SIC 3764 - Guided Missile and Space Vehicle Propulsion Units and Propulsion Unit Parts
SIC 3769 - Guided Missile and Space Vehicle Parts and Auxiliary Equipment, Not Elsewhere Classified
SIC 3792 - Travel Trailers and Campers
SIC 3795 - Tanks and Tank Components
SIC 3799 - Transportation Equipment, Not Elsewhere Classified
SIC 3811 - Engineering, Laboratory, Scientific, and Research Instruments and Associated Equipment
SIC 3822 - Automatic Controls for Regulating Residential and Commercial Environments and Appliances
SIC 3823 - Industrial Instruments for Measurement, Display and Control of Process Variables; and Related Products
SIC 3824 - Totalizing Fluid Meters and Counting Devices
SIC 3825 - Instruments for Measuring and Testing of Electricity and Electrical Signals
SIC 3829 - Measuring and Controlling Devices, Not Elsewhere Classified
SIC 3832 - Optical Instruments and Lenses
SIC 3841 - Surgical and Medical Instruments and Apparatus
SIC 3842 - Orthopedic, Prosthetic, and Surgical Appliances and Supplies
SIC 3843 - Dental Equipment and Supplies
SIC 3851 - Ophthalmic Goods
SIC 3873 - Watches, Clocks, Clockwork Operated Devices and Parts
SIC 3911 - Jewelry, Precious Metal
SIC 3914 - Silverware, Plated Ware, and Stainless Steel Ware
SIC 3915 - Jewelers' Findings and Materials, and Lapidary Work
SIC 3931 - Musical Instruments
SIC 3942 - Dolls
SIC 3944 - Games, Toys, and Children's Vehicles; Except Dolls and Bicycles
SIC 3949 - Sporting and Athletic Goods, Not Elsewhere Classified
SIC 3951 - Pens, Mechanical Pencils, and Parts (Balance)
SIC 3961 - Costume Jewelry and Costume Novelties, Except Precious Metal
SIC 3991 - Brooms and Brushes
SIC 3993 - Signs and Advertising Displays
SIC 3995 - Burial Caskets

19. *ELECTROPLATING*

SIC 347- - Coating, Engraving, and Allied Services

20. *ORE MINING AND DRESSING*

SIC 1011 - Iron Ores
SIC 1021 - Copper Ores
SIC 1031 - Lead and Zinc Ores
SIC 1041 - Gold Ores
SIC 1044 - Silver Ores
SIC 1051 - Bauxite and Other Aluminum Ores
SIC 1061 - Ferroalloy Ores, Except Vanadium
SIC 1092 - Mercury Ores
SIC 1094 - Uranium-Radium-Vanadium Ores
SIC 1099 - Metal Ores, Not Elsewhere Classified

21. *COAL MINING*

SIC 1111 - Anthracite
SIC 1112 - Anthracite Mining Services
SIC 1211 - Bituminous Coal and Lignite
SIC 1213 - Bituminous Coal and Lignite Mining Services

ALLIED CHEMICAL CORPORATION

MEMORANDUM

JUNE 1, 1979

D. R. Fitts

HON. BOB ECKHARDT SURVEY

Attached is the Waste Disposal Survey completed for the Toledo Plant.

Also attached for your files is a copy of the confirmatory letter that was sent to those persons interviewed to collect the information for this report. We do not intend this letter to be a part of the report.

R. Ray and W. Mauter did a good job compiling the report. Let us know if you have any questions.

R. H. Wholf

RHW:bw
Encl.

cc: N. Kuller
R. Ray
W. Mauter

x ref to 10/30/82 letter from Shields

Allied Chemical

MEMORANDUM

DATE: May 30, 1979

SUBJECT: PAST PRACTICES FOR DISPOSAL OF WASTE MATERIALS

TO: R. J. Donovan
J. P. Evans
E. L. Kratzman
W. H. von Harling
B. J. Schaller

Per a request by the Congressional Subcommittee on Oversight and Investigations, we were asked to fill out a survey covering our waste disposal practices since 1950. Our records since 1973 are no longer available, thus much of the information was obtained through interviews with present and past employees.

The following is a general overview from the information obtained from several employees. Please review same and let us know by June 5th if you are in general agreement.

GENERAL WASTE

Most of our general waste is collected in compactors and hauled by our employees to landfills. The sites used since 1950 are:

1. Western or South Street Dump - 1950-1957
2. Consaul Street Dump - 1957-1959
3. Dura Dump Landfill - 1959-1965
4. Kings Road Landfill - 1965-1973
5. Westover Landfill - 1973-Present

In addition, when our compactors were out of order, R. Donovan has had BFI haul some waste to their Hagman Road Landfill.

COATING RESIN WASTE

When the Coating Resin Plant was in operations, Fondessy took most of the plant waste other than plasticizing oil and general lubricating oils.

These wastes mostly consisted of filter press waste, mixer clean waste, gelled resin waste and sometimes spent solvents.

Terry Little took some plasticizing and other oil products waste during the period the Coating Resin Plant was in operations.

After the Coating Resin Plant ceased operations, J. L. Spradlin Company took the mixer clean waste and flammable waste to the Evergreen Landfill in Wood County.

C-639(1-76) ©

OTHER

From Maintenance records it was determined that Roto Roter cleaned the Molding Compound East Sump on at least one occasion and BFI on another.

BFI has also cleaned the formaldehyde storage tank.

We could find no records on the clean-out and disposal of material from the roto-cone pond. However it was recalled that on at least one occasion the material was taken to a dump on Glendale Avenue owned by Constable Biggs.

W. R. Mauter

WRM:bw
cc: R. H. Wholf

(DO NOT USE)

FORM A: GENERAL FACILITY INFORMATION

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Address: 2829 GLENDALE AVENUE
No. Street

TOLEDO OHIO 43614
City State Zip Code

Name of Person Completing Form: R. H. WHOLF

Position: MANAGER ENVIRONMENTAL SERVICES

Phone Number: (201) 455-4294 (J. Garrison - contact)

1. Year Facility Opened .....purchased from Libbey Owens Ford..... 19 [5][3] (10-11)

2. Primary SIC Code : ..... [2][8][2] (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:

thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (16-24)

hundred tons ..... [ ][ ][ ][ ][ ][2][1] (25-32)

thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill ..... [1][0][0] (42-44)

in pit/pond/lagoon ..... [ ][ ][-] (45-47)

in deep well ..... [ ][ ][-] (48-50)

incinerated ..... [ ][ ][0] (51-53)

reprocessed/recycled ..... [ ][ ][-] (54-56)

evaporated ..... [ ][ ][-] (57-59)

unknown ..... [ ][ ][-] (60-62)

other (Specify_____) ..... [ ][ ][-] (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950?..... [1][4] (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) ..... [1] (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facili[redacted] ..... [ ] (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms .....19[7][3] (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms .....19[ ][ ] (73-74)

FORM A: GENERAL FACILITY INFORMATION

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Address: 2829 GLENDALE AVENUE
No. Street

TOLEDO OHIO 43614
City State Zip Code

Name of Person Completing Form: R. H. WHOLF

Position: MANAGER ENVIRONMENTAL SERVICES

Phone Number: (201) 455-4294 (J. Garrison - contact)

1. Year Facility Opened .....purchased from Libbey Owens Ford..... 19 [5][3] (10-11)

2. Primary SIC Code : ..... [2][8][2] (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:

thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (16-24)

hundred tons ..... [ ][ ][ ][ ][ ][2][1] (25-32)

thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill ..... [1][0][0] (42-44)

in pit/pond/lagoon ..... [ ][ ][-] (45-47)

in deep well ..... [ ][ ][-] (48-50)

incinerated ..... [ ][ ][0] (51-53)

reprocessed/recycled ..... [ ][ ][-] (54-56)

evaporated ..... [ ][ ][-] (57-59)

unknown ..... [ ][ ][-] (60-62)

other (Specify_____)..... [ ][ ][-] (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950?..... [1][4] (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) ..... [1] (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility [redacted]..... [1] (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms .....19[7][3] (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms .....19[ ][ ] (73-74)

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WESTERN/SOUTH AVENUE TOLEDO MUNICIPAL SANITARY LANDFILL
Address of Site: SOUTH AVENUE and MAUMEE RIVER
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): TOLEDO CITY
Address:
no. street

TOLEDO OHIO
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [1] (12)
   IF CLOSED, specify year closed ..... 19[5][7] (13-14)
4. Year first used for process waste from this facility ..... 19[5][0] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[5][6] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons .....EST. [ ][ ][ ][ ][8][6] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [2] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [2] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify)_____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [1] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

NOTE: Allied Chemical acquired producing facility from Libbey Owens Ford in 1953.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: WESTERN/SOUTH AVENUE MUNICIPAL DUMP

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICAL DIVISION - TOLEDO, OHIO
Name of Site: CONSAUL STREET TOLEDO MUNICIPAL SANITARY LANDFILL
Address of Site: CONSAUL STREET AND C&O RAILROAD
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): TOLEDO CITY
Address: TOLEDO OHIO
no. street

city state zip code

Current Owner (if different from above): UNKNOWN
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [1] (12)
   IF CLOSED, specify year closed ..... 19[5][9] (13-14)
4. Year first used for process waste from this facility ..... 19[5][7] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[5][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [| | | | | |] (19-26)
   hundred tons .....EST.... [| | | | | 5 | 6] (27-33)
   thousand cubic yards ..... [| | | | | |] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [2] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [2] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify)_____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: CONSAUL STREET TOLEDO MUNICIPAL SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadi[redacted]palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

Only trace amounts of heavy metals and solvents were in waste.

FORM B: DISPOSAL SITE INFORMATION [illegible]

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: ~~SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO~~
Name of Site: DURA TOLEDO MUNICIPAL SANITARY LANDFILL
Address of Site: MATZINGER ROAD
no. street

TOLEDO OHIO 43612
city state zip code

Name of Owner (while used by facility): TOLEDO CITY
Address: ______
no. street

TOLEDO OHIO
city state zip code

Current Owner (if different from above): Same
Address: ______
no. street

______
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) .... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) .... [2] (12)
   IF CLOSED, specify year closed .... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility .... 19[6][0] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) .... 19[6][5] (17-18)
6. Total amount of process waste from this facility disposed at site:
   - thousand gallons .... [ ][ ][ ][ ][ ][ ][ ][ ] (19-26)
   - hundred tons .... [ ][ ][ ][ ][1][3][8] (27-33)
   - thousand cubic yards .... [ ][ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   - landfill, mono industrial waste .... [3] (42)
   - landfill, mixed industrial waste .... [2] (43)
   - landfill, drummed waste .... [9] (44)
   - landfill, municipal refuse co-disposed ... [1] (45)
   - pits/ponds/lagoons .... [9] (46)
   - deep well injection .... [9] (47)
   - land farming .... [9] (48)
   - incineration .... [9] (49)
   - treatment (eg. neutralizing)............. [9] (50)
   - reprocessing/recycling .... [9] (51)
   - other (specify) ______ .... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) .... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

[illegible] [illegible]

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: DURA TOLEDO MUNICIPAL SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: FONDESSY OTTER CREEK ROAD
Address of Site: 876 OTTER CREEK ROAD
no. street

OREGON OHIO 43616
city state zip code

Name of Owner (while used by facility): FONDESSY ENTERPRISES INC.
Address: 876 OTTER CREEK ROAD
no. street

OREGON OHIO
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... 19[50] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) .....EST. 19[69] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ] (19-26)
   hundred tons .....EST. [ ] [ ] [ ] [ ] [1] [5] [0] (27-33)
   thousand cubic yards ..... [ ] [ ] [ ] [ ] [ ] [ ] [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [1] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Allied Chemical acquired producing facility from Libbey Owens Ford in 953.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: FONDESSY OTTER CREEK ROAD

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium)	9	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: TERRY LITTLE (sold to Commercial Oil Co.)
Address of Site: _____
no. street

FOSTORIA OHIO
city state zip code

? also known as "GRIENERS" or Taylor rd.

Name of Owner (while used by facility): TERRY LITTLE
Address: _____
no. street

FOSTORIA OHIO
city state zip code

Current Owner (if different from above): UNKNOWN
Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
   IF CLOSED, specify year closed ..... 19 _ _ (13-14)
4. Year first used for process waste from this facility ..... EST. 19 5 0 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 9 (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... _ _ _ _ _ _ _ (19-26)
   hundred tons ..... EST. _ _ _ _ 1 0 0 (27-33)
   thousand cubic yards ..... _ _ _ _ _ _ _ (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste 9 (42)
   landfill, mixed industrial waste 9 (43)
   landfill, drummed waste 9 (44)
   landfill, municipal refuse co-disposed ... 9 (45)
   pits/ponds/lagoons 2 (46)
   deep well injection 9 (47)
   land farming 9 (48)
   incineration 9 (49)
   treatment (eg. neutralizing)..... 9 (50)
   reprocessing/recycling 2 (51)
   other (specify) _____.... 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Allied Chemical acquired producing facility from Libbey Owens Ford in 1953.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: TERRY LITTLE (sold to Commercial Oil Co.)

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanad·m, [illegible] palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Primarily tank scrap plasticizer oils. Trace quantities of other substances only.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: EVERGREEN SANITARY LANDFILL
Address of Site: 6525 WALES ROAD
no. street

WOOD COUNTY, OHIO 43619
city state zip code

Name of Owner (while used by facility): OHIO WASTE SYSTEMS INC.
Address: 6525 WALES ROAD
no. street

WOOD COUNTY, OHIO
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [9] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[6][9] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][7] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][3] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [1] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: EVERGREEN SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium [redacted])	2	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: EVERGREEN SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
Mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. Pt, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: KING ROAD LUCAS COUNTY SANITARY LANDFILL
Address of Site: 3535 KING ROAD
no. street

TOLEDO OHIO 43617
city state zip code

Name of Owner (while used by facility): LUCAS COUNTY
Address:
no. street

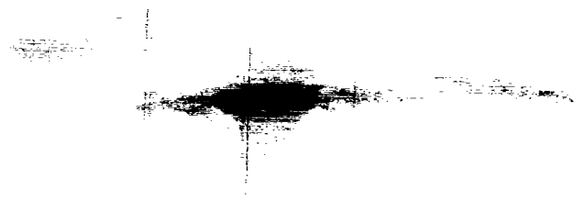
TOLEDO OHIO
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[6][5] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][3] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][2][1][3] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [2] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [1] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW



Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: KING ROAD LUCAS COUNTY SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, [redacted] palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WESTOVER CORPORATION SANITARY LANDFILL
Address of Site: 820 OTTER CREEK RD.
no. street

OREGON OHIO 43616
city state zip code

Name of Owner (while used by facility): WESTOVER CORPORATION SANITARY LANDFILL
Address: 820 OTTER CREEK ROAD
no. street

OREGON OHIO 43616
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7][3] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][1][6][3] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   - **landfill**, mono industrial waste ..... [3] (42)
   - **landfill**, mixed industrial waste ..... [1] (43)
   - **landfill**, drummed waste ..... [9] (44)
   - **landfill**, municipal refuse co-disposed ... [9] (45)
   - **pits/ponds/lagoons** ..... [3] (46)
   - **deep well** injection ..... [3] (47)
   - **land farming** ..... [3] (48)
   - **incineration** ..... [3] (49)
   - **treatment** (eg. neutralizing)..... [3] (50)
   - **reprocessing/recycling** ..... [3] (51)
   - **other** (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WESTOVER CORPORATION SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: BROWNING FERRIS INDUSTRIAL WASTE SYSTEMS
Address of Site: 6233 HAGMAN ROAD
no. street

TOLEDO OHIO 43612
city state zip code

Name of Owner (while used by facility): BFI
Address: SAME
no. street

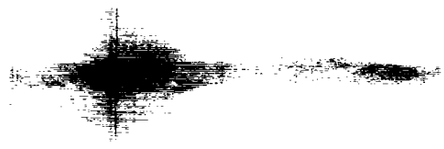
city state zip code

Current Owner (if different from above): SAME
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7][7] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][0] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify)_____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW



Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: BROWNING FERRIS INDUSTRIAL WASTE SYSTEMS

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, plat[illegible] palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

Only trace amounts of heavy metal and solvents were in wastes.

FORM C: HAULER INFORMATION (DO NOT USE)

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO

Name of Firm or Contractor	Address	ICC # (If Known)	Years Used
ALLIED CHEMICAL CORPORATION	2829 GLENDALE AVENUE TOLEDO, OHIO 43614		1950-1979
BROWNING FERRIS INDUSTRIES	6233 HAGMAN RD. TOLEDO, OHIO		1977-1979
TERRY LITTLE CORPORATION	FOSTORIA, OHIO		1950-1968
COMMERCIAL OIL COMPANY	FOSTORIA, OHIO		1968-1970
FONDESSY COMPANY	876 OTTER CREEK ROAD OREGON, OHIO		1950-1969
J. L. SPRADLEN COMPANY	1820 WOODMORE STREET TOLEDO, OHIO		1969-1977
BENTON SANITATION	P.O. BOX 654 TOLEDO, OHIO		1975-1976

THERE IS NO FORM D SUPPLEMENTAL HAULER INFORMATION FOR THIS LOCATION.

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WAYNE DISPOSAL COMPANY
Address of Site: _____
no. street

YPSILANTI, MICHIGAN
city state zip code

Name of Owner (while used by facility): WAYNE DISPOSAL COMPANY
Address: _____
no. street

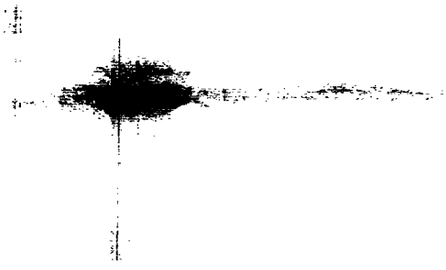
YPSILANTI MICHIGAN
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [9] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility .....EST. 19[7][7] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][1] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [2] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify)_____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW



Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WAYNE DISPOSAL COMPANY

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WAYNE DISPOSAL COMPANY
Address of Site: _____
no. street

RAWSONVILLE, MICHIGAN
city state zip code

Name of Owner (while used by facility): WAYNE DISPOSAL COMPANY
Address: _____
no. street

RAWSONVILLE, MICHIGAN
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [9] (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... EST. 19[77] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[79] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ] (19-26)
   hundred tons ..... [ ] (27-35) 4/09
   thousand cubic yards ..... [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [2] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WAYNE DISPOSAL COMPANY (Rawsonville, Michigan)

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: LIQUID DISPOSAL COMPANY
Address of Site: _____
no. street

UTICA MICHIGAN _____
city state zip code

Name of Owner (while used by facility): LIQUID DISPOSAL COMPANY
Address: _____
no. street

UTICA, MICHIGAN _____
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... EST. 19[7][7] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-25)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][0] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [9] (42)
   landfill, mixed industrial waste ..... [9] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [1] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____ .... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [9] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS CORPORATION

Site Name: LIQUID DISPOSAL COMPANY

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION
Name of Site: SWAN CREEK LANDFILL
Address of Site: GLENDALE AVENUE AT SWAN CREEK
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): CONSTABLE BIGGS
Address: GLENDALE AVENUE
no. street

TOLEDO OHIO
city state zip code

Current Owner (if different from above): TOLEDO METROPOLITAN PARK SYSTEM
Address: GLENDALE AVENUE AT SWAN CREEK
no. street

TOLEDO OHIO 43614
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [1] (12)
   IF CLOSED, specify year closed ..... UNKNOWN ... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... UNKNOWN ... 19[ ] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... EST. 19[7 1] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ] (19-26)
   hundred tons ..... EST. ... [5] (27-33)
   thousand cubic yards ..... [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   - landfill, mono industrial waste ..... [3] (42)
   - landfill, mixed industrial waste ..... [2] (43)
   - landfill, drummed waste ..... [9] (44)
   - landfill, municipal refuse co-disposed ... [9] (45)
   - pits/ponds/lagoons ..... [9] (46)
   - deep well injection ..... [9] (47)
   - land farming ..... [9] (48)
   - incineration ..... [9] (49)
   - treatment (eg. neutralizing) ..... [9] (50)
   - reprocessing/recycling ..... [9] (51)
   - other (specify) _____ .... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [1] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: SWAN CREEK LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION
Name of Site: NUCLEAR ENGINEERING CLASS I LANDFILL
Address of Site: _____
no. street

SHEFFIELD ILLINOIS 61361
city state zip code

Name of Owner (while used by facility): NUCLEAR ENGINEERING COMPANY INC.
Address: P.O. Box 158
no. street

SHEFFIELD, ILLINOIS 61361
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ][ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7][8] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][8] (17-18)
6. Total amount of process waste from this facility disposed at site:
   thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   hundred tons ..... [ ][ ][ ][ ][ ][ ][0] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste ..... [3] (42)
   landfill, mixed industrial waste ..... [1] (43)
   landfill, drummed waste ..... [9] (44)
   landfill, municipal refuse co-disposed ... [9] (45)
   pits/ponds/lagoons ..... [9] (46)
   deep well injection ..... [9] (47)
   land farming ..... [9] (48)
   incineration ..... [9] (49)
   treatment (eg. neutralizing)..... [9] (50)
   reprocessing/recycling ..... [9] (51)
   other (specify) _____.... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: NUCLEAR ENGINEERING CLASS I LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

Note: Only material disposed at this site was a 25 pound package of Rhodamine Yellow pigment.

L. Fawcett
H. Belden

10/1/73

CITY OF TOLEDO OHIO

POLLUTION CONTROL AGENCY

JAMES B. DAKEN
CITY MANAGER

PAUL D. FINDLAY
DIRECTOR OF POLLUTION CONTROL

OFFICES: 26 MAIN STREET
ZIP CODE 43605
TELEPHONE: (419) 255-1500
EXT. 445

9/27/73

September 26, 1973

Mr. S. F. Harantha, Plant Manager
Allied Chemical Corporation
Plastics Division
2829 Glendale Avenue
Toledo, Ohio 43614

Dear Mr. Harantha:

I am in receipt of your letter of September 18th as it would have to do with solid waste disposal sites in the Toledo area. I would like to make reference to your remarks relative to the Dura Landfill. You indicated the following:

> "Closed to all commercial and industrial haulers. Site should have been completely closed several months ago and will be closed in about three months to residential refuse."

In checking this last week with Mr. Van Cott, Acting Commissioner, Division of Solid Wastes, I noted that in 1968 an ordinance was passed which outlawed commercial and industrial haulers to use the Dura Landfill. According to Mr. Van Cott, however, it is not true that this landfill (Dura) will be closed in about three months to residential refuse. The City has secured an additional 13 acres adjacent to Dura and it is projected by Mr. Van Cott that residential refuse could go into the Dura Landfill for approximately 22 months.

As you are aware, there is an Environmental Studies Committee Report, dated April 3, 1973, to the Board of Trustees of the Toledo Area Chamber of Commerce on industrial solid waste which is contained in a Summary Report of the Survey dated April 4, 1973. This office does not have a complete report on the Survey but I have with this cover letter sent several of the Summary Reports of the Survey, one to Mr. Eugene R. Kasper, Director of the Department of Public Service and to Mr. Van Cott, who works as Acting Commissioner under Mr. Kasper.

As you know the City Manager has a Solid Waste Task Force under the direction of Mr. Richard Boers, Commissioner, Division of Forestry, and at many of these meetings I have indicated that if we are going to consider as a responsibility the proper method of disposal, for instance, in landfills of industrial solid waste which, of course, would include as far as I am concerned liquids, slurries, sludges. It is necessary to know the quality and quantity of the many different types of industrial waste produced by local

SEP 27 '73

industry. At the meetings of the Solid Waste Task Force which I have attended the sophistication of some of this industrial waste has not been made known to the members of the Task Force. Although Mr. Lieder of Sun Oil, Chairman of the Industrial Solid Waste Subcommittee of the Environmental Studies Committee of the Chamber is on the Task Force, he is also a member of the City Manager's Task Force on Solid Waste.

I am sending a copy of your letter to Mr. Kasper and Mr. Van Cott for their information, and as indicated, also sending them a Summary of the Report of the Survey of the Toledo Area Chamber of Commerce.

Very truly yours

Paul D. Findlay
Director

PDF:r
att.
cc: Floyd Shepherd, TACC (Toledo Area Chamber of Commerce)
Richard Boers, Comm'r, Div. of Forestry
W. R. Van Cott, Act'g Comm'r, Div. of Solid Wastes
Eugene R. Kasper, Director, Dept. of Public Service

Public, Industry Waste Disposal Pact Suggested

Chamber Urges Combined Effort To Solve Problems

Industry and government should quickly form a partnership to find methods of disposing of a steadily rising mountain of solid waste, according to a special study committee of the Toledo Area Chamber of Commerce.

The report by the environmental studies committee found that industries here dispose of an estimated 94,000 tons of solid waste a year. This compares with 120,000 tons of household trash collected annually by the city of Toledo.

The report will be forwarded to the Toledo solid waste task force, appointed by City Manager Daken last year to look for new disposal sites; the Toledo Metropolitan Area Council of Governments, and the Ohio Environmental Protection Agency, all of which are studying disposal needs.

The chamber's board of trustees has adopted a study committee's recommendation that the chamber coordinate industry's part in disposal planning.

The survey involved completion of questionnaires by local industries which employ more than half of Toledo's manufacturing work force.

Most industries now dispose of their waste at private landfills or on the plant site. State regulations do not cover waste disposal on private property, as long as there is no pollution of air or water outside plant boundaries.

Space Decreasing

The report team warned that the available landfill space is steadily decreasing, as the volume of solid wastes increases.

"[illegible], in the form of no disposal sites, is just around the corner," the report said.

Two governmental sites have [illegible] Toledo [illegible] landfill has a projected life of two years and the county's King Road landfill is to be closed in June. The only other public landfill in northwestern Ohio, exclusive of the Rossford municipal landfill, will then be the Wood County landfill, six miles west of Bowling Green.

Industries have a problem because not all types of industrial wastes are suitable for municipal or private landfills, the report said. Most industries surveyed said that if disposal costs rise because of the lack of disposal facilities in the area, then consumer price rises will follow.

New Methods Needed

Recycling of waste is done by some industries, but only where it is economically feasible. Further recycling will require new methods or markets for the recycled materials, the report said.

There are possibilities for using some wastes in new processes, particularly liquid wastes, which are disposed of at an annual volume of 17 million gallons in the Toledo area, the survey estimated.

Most of the liquid wastes are oil-based and are disposed of by high - intensity incineration, which leaves no residue or smoke. The report notes that there is a reasonably large volume of high heating value in liquid waste incinerated, and there are some studies being made to determine how to combine some types of liquid wastes as possible energy sources.

The report suggested that construction of a large liquid-waste incinerator be undertaken on a regional basis, since studies have shown that the larger an incinerator, the more efficient it is.

Opportunities exist in proper waste management to use one type of waste to dispose of another, the report said. For example, the waste metal-pickling discharge of Detroit industry has been used to remove phosphates in municipal sewage.

W. Donald Lieder, an engineer with Sun Oil Co., was chairman of the special study team. Other members were Dr. Gary F. Bennett, University of Toledo; John S. Ehrgymson, Sinclair Manufacturing Co., and Richard J. MacAdams, of Samborn, Steketee, Otis & Evans, Inc., an engineering firm.

The Blade
April 28, 1973

TOLEDO AREA CHAMBER OF COMMERCE [illegible]

The Toledo Times
May 1, 1973

Chamber Offers To [illegible] Waste Disposal Pro[illegible]

The Toledo Area Chamber of Commerce has offered its services as an agency to coordinate industry's role in solving the problem of waste disposal.

Assistance was proposed in a study by an environmental committee and approved by the organization's board of trustees.

Industrial waste disposal is an expensive and growing problem in the Toledo area and solutions to it should be considered at the same time that general public disposal facilities are being planned, the study pointed out.

Recommendations have been forwarded to the City of Toledo's solid waste task force, the Toledo Metropolitan Area Council of Governments, and the Ohio Environmental Protection Agency. These agencies are studying the disposal needs of the metropolitan area.

The study estimated that [illegible] industrial wastes in the To[illegible] area amount to 93,[illegible] tons [illegible]nually. This compares to 12[illegible] tons of household trash collec[illegible] each year in Toledo and sho[illegible] the magnitude of the industr[illegible] need. Industries also gener[illegible] an estimated 17 million gal[illegible] annually of liquids and s[illegible] that are unacceptable for [illegible] posal through the sanitary s[illegible]er system.

Planning action is requi[illegible] now, the study concluded, [illegible] cause the disposal needs of [illegible]ernment and industry have [illegible] come critical [illegible] it makes sense to develop combined [illegible] the [illegible]mittee recommended.

W. Donald Lieder of the [illegible] Oil Co. was chairman of [illegible] study committee.

* * *

DATE: April 3, 1973

MEMO TO: Chamber Board of Trustees

FROM: Environmental Studies Committee

RECOMMENDATION: The Environmental Studies Committee requests authorization of the Chamber Board of Trustees to act in the role of providing industrial input to any Toledo area potential government solution of waste disposal, whether on a municipal basis or any other basis.

Background

Presently the City of Toledo has a task force evaluating various methods for disposal for their municipal (household) solid wastes. Also TMACOG (Toledo Metropolitan Area Council of Governments) is seeking funds to conduct an extensive regional solid waste study of three Ohio counties (Lucas, Wood and Ottawa) and two neighboring Michigan townships.

The Toledo Area Chamber of Commerce conducted a survey to examine the waste disposal problems being encountered by Toledo industries as industrial input to the government planning processes. Both solid and liquid waste unacceptable in the sanitary sewers were included. The survey placed special emphasis in listing unusual industrial wastes, wastes requiring special disposal, and estimates on general disposal volume.

Replies were received from area industries in response to a questionnaire sent out under the auspices of the Toledo Area Chamber of Commerce, inquiring about solid and liquid waste problems. Comments on present and anticipated disposal problems were particularly encouraged. The firms responding employ over one-half of the total working force in manufacturing plants in Toledo.

The replies were tabulated, evaluated, and the result is the summary report attached.

Basic Facts Supporting Recommendation

1. The magnitude of the problem is such that an industrial input must be considered in any potential government solution of waste disposal whether on a municipal basis or a complete multi-county, regional basis. Since industry is part of the community, it is logical that efforts in these areas include serious consideration of industry's problems and that solutions be sought in partnership with industry.

2. A concerted effort should be mounted by industry to cooperate with government bodies who are attempting to define and solve the community waste disposal problem.

3. The Toledo Area Chamber of Commerce would be an appropriate vehicle to coordinate industry's part in such an effort.

TOLEDO AREA CHAMBER OF COMMERCE

C-C

218 HURON STREET, TOLEDO, OHIO 43604 • PHONE (419) 243-8191

TOLEDO AREA

INDUSTRIAL SOLID WASTE

SUMMARY REPORT OF SURVEY

TOLEDO AREA CHAMBER OF COMMERCE

APRIL 4, 1973

By: Solid Waste Subcommittee of the
Environmental Studies Committee

Chairman: W. Donald Lieder, P.E.
Sun Oil Company

Members: Dr. Gary F. Bennett
University of Toledo

John S. Efroymson
Sinclair Manufacturing Company

Richard J. MacAdams, P.E.
Samborn, Steketee, Otis
& Evans, Inc.

INTRODUCTION

Presently the City of Toledo has a task force evaluating various methods for disposal for their municipal (household) solid wastes. Also TMACOG is seeking funds to conduct an extensive regional solid waste study of three Ohio counties (Lucas, Wood and Ottawa) and two neighboring Michigan townships.

The Toledo Area Chamber of Commerce conducted a survey to examine the waste disposal problems being encountered by Toledo industries as industrial input to the government planning processes. Both solid and liquid waste unacceptable in the sanitary sewers were included. The survey placed special emphasis in listing unusual industrial wastes, wastes requiring special disposal, and estimates on general disposal volume.

Replies were received from area industries in response to a questionnaire sent out under the auspices of the Toledo Area Chamber of Commerce, inquiring about solid and liquid waste problems. Comments on present and anticipated disposal problems were particularly encouraged. The firms responding employ over one-half of the total working force in manufacturing plants in Toledo.

The replies were tabulated, evaluated, and the result is this summary report of the SOLID WASTE SURVEY conducted under the sponsorship of the Toledo Area Chamber of Commerce.

CONCLUSIONS FROM SURVEY

Analysis of the data from those firms which replied indicates a comprehensive representation of the total Toledo industrial community. From this information it is possible to project the total industrial output of such solid waste material. The following conclusions have been drawn from the data.

1. Total industrial wastes in the Toledo area are estimated as:

   Solids*.....94,000 tons annually

   Liquids, Slurrys, Sludges ..... 17,000,000 gallons annually

   *NOTE: The solids total compares to 120,000 tons of household trash collected annually in the City of Toledo.

2. Landfill provides the overwhelmingly predominate method of disposal of these materials.

3. The various materials being discarded are widely heterogenous (different types of waste). Solid materials are generally of a non-offensive nature, (i.e., reasonably inert), while the liquid materials pose a more difficult problem.

4. The problem of industrial waste disposal is increasing rapidly in both scope and magnitude.

RECOMMENDATIONS

1. The magnitude of the problem is such that an industrial input must be considered in any potential government solution of waste disposal whether on a municipal basis or a complete multi-county, regional basis. Since industry is part of the community, it is logical that efforts in these areas include serious consideration of industry's problems and that solutions be sought in partnership with industry.

2. A concerted effort should be mounted by industry to cooperate with government bodies who are attempting to define and solve the community waste disposal problem.

3. The Toledo Area Chamber of Commerce would be an appropriate vehicle to coordinate industry's part in such an effort.

DISCUSSION

There are three very evident facts which surface immediately from the survey. The first is the great mass and volume of industrial waste; the second, its extreme lack of homogeneity; and third, its universal disposal by landfill.

That Toledo industrial waste is not homogenous is an understatement. The material runs the gamut from inert inorganic solids, through food and paper normally associated with household waste, to liquid acids, bases, oils and complex organic materials.

Although this diversity challenges disposal techniques, it does represent some opportunities for waste management, i.e., the acid waste of one industry could be used to neutralize the caustic of another. (For example, the waste metal pickling liquor of Detroit industry has been used to separate phosphates in municipal sewage.)

Finally, it is noted that there is a reasonably large volume of high heating value liquid waste which could be handled by incineration. This subject has already been the topic of a report prepared by Samborn, Steketee, Otis and Evans for Fondessy Enterprises. The mixing of wastes of various heating values to obtain a combustible mixture has also been studied by COPE Enterprises of Houston, Texas.

While the solid-waste problem of industry grows at an ever-increasing rate, and the community relies on landfill for disposal, the available landfill area shrinks. The two governmental sites have limited life. Dura (City of Toledo) has a projected span of two years due to recent property purchases, while King Road (Lucas County) has a six-month extension (from January 1, 1973) due to the addition of another layer. This is a remarkably short expected life for solid waste disposal which, however, should be of more concern to local government than industry. Industrial waste with its heterogenous nature, is not accepted by the city, nor openly welcomed by the county. If industry is looking for a stable long-range environment for operating, the solid waste problem area is not one in which they should feel secure; disaster, in the form of no disposal site, is just around the corner.

Difficulty in disposing of solid waste materials was an almost universal problem among the companies surveyed. The nature of the problem is not lost upon the management of the responding firms, and there does seem to be a desire for reasonable solutions. The cost factor obviously plays a major part in this solid waste problem and these costs will be reflected in plant operation and ultimately product costs. Specifically, the availability of landfill sites and transportation to those sites were classified as the major problems by industry.

Paper and paper products were suggested as the primary reusable material. The second item mentioned was glass and then various metallic scrap including cans and drums. Industry does recycle material where there is any economic feasibility in doing so, as a basic part of profit maintenance and cost cutting. Therefore, further recycling would require new methods or markets for the recycled materials.

Incineration of specific high heating value liquids is a possible solution. It is a fact that the larger the incinerator, the greater its effectiveness and the smaller the problems of its secondary effluents. The construction of such a facility might best be approached on a multi-company or regional authority basis.

A partial breakdown of both the solid and liquid waste materials is shown on Tables 1 and 2.

TABLE 1

SOLIDS

Total annual volume.....94,000 tons

Composition:		
	Glass and other inorganics	40%
	General - not defined	38%
	Paper, Cardboard	10%
	Plastic, Rubber, Textile	7%
	Metal	4%
	Construction - Rubble*, Wood	1%
	Total	100%

*NOTE: The low percentage of demolition rubble shown here indicates the exclusion of the construction industry from this survey, rather than its lack of importance as a solid waste problem.

TABLE 2

LIQUIDS, SLUDGES, SLURRIES

Total annual volume.....17,000,000 gallons

Composition:		
	Oil Based	
	Sludges and Slurries	83%
	Liquids	2%
	Water Based	
	Sludges and Slurries	6%
	Liquids	9%
	Total	100%

*NOTE: Definition of Solid Waste for this report:

For the purpose of this report solid wastes are considered to include not only solid materials but also those liquid wastes which are not acceptable for the sanitary sewer system.

Typical of 60's

TOLEDO OPERATIONS
COMBUSTIBLE SCRAP

6-17-63

	ESTIMATED POUNDS/WEEK
1. AD BLDG. LOAD LUGGER	1,000
2. COATING RESIN	
a) Kettle #1, Bag P.A.	715
b) Plasticizer Press Papers (finished prod. only)	105
c) Locker & Office scrap, cotons & misc.	750
3. GRANULAR AMC - 2 SHIFTS	
a) Asbestos, Clay, Floc, Zinc, Barium, Glass bags	1,200
b) Polyester cartons	200
4. REINFORCED AMC - 3 SHIFTS	
a) Clay, Barium Antimony bags	170
b) Glass cartons	285
c) Unit Load corrugated paper covering	360
d) Disposable pallets	810
5. MOLDING COMPOUND - BASED ON BULK UREA & MELAMINE	
a) Paper crates - pulp room, drum wash	1,600
b) Bags: Hexa, Lube, Ti-Pure, #9, B.C., etc.	470
c) Locker & Snack rooms, offices	750
NOTE: Melamine - Bags 2,390#/Wk.	
Urea - Bags 1,750#/Wk.	
6. MISCELLANEOUS	
a) Scrap & Disposable pallets, C.R. , M.C.	2,700
b) Boxcar blocking, dunnage, mat'ls handling	500
c) Boiler house, maint. bldg., yard	150
7. ~~SYLVAN~~	
a) Urea bags and pecan shell flour	500
b) Locker room, lab, office, misc. scrap	200
TOTAL	12,465

? 7. Flyash (3 T/L week) Summer
(5 T/L week) Winter

8. Molding Compound scrap 50#

I. E. Dept.
MEM/mhh

Allied Chemical

MEMORANDUM

HAS HANDWRITTEN NOTES!

DATE: May 30, 1979

SUBJECT: PAST PRACTICES FOR DISPOSAL OF WASTE MATERIALS

TO: R. J. Donovan
J. P. Evans
E. L. Kratzman
W. H. von Harling
B. J. Schaller

Per a request by the Congressional Subcommittee on Oversight and Investigations, we were asked to fill out a survey covering our waste disposal practices since 1950. Our records since 1973 are no longer available, thus much of the information was obtained through interviews with present and past employees.

The following is a general overview from the information obtained from several employees. Please review same and let us know by June 5th if you are in general agreement.

GENERAL WASTE

Most of our general waste is collected in compactors and hauled by our employees to landfills. The sites used since 1950 are:

1. Western or South Street Dump - 1950-1957
2. Consaul Street Dump - 1957-1959
3. Dura Dump Landfill - 1959-1965
4. Kings Road Landfill - 1965-1973
5. Westover Landfill - 1973-Present

In addition, when our compactors were out of order, R. Donovan has had BFI haul some waste to their Hagman Road Landfill.

COATING RESIN WASTE

When the Coating Resin Plant was in operations, Fondessy took most of the plant waste other than plasticizing oil and general lubricating oils.

These wastes mostly consisted of filter press waste, mixer clean waste, gelled resin waste and sometimes spent solvents.

Terry Little took some plasticizing and other oil products waste during the period the Coating Resin Plant was in operations.

After the Coating Resin Plant ceased operations, J. L. Spradlin Company took the mixer clean waste and flammable waste to the Evergreen Landfill in Wood County.

OTHER

From Maintenance records it was determined that Roto Roter cleaned the Molding Compound East Sump on at least one occasion and BFI on another.

BFI has also cleaned the formaldehyde storage tank.

We could find no records on the clean-out and disposal of material from the roto-cone pond. However it was recalled that on at least one occasion the material was taken to a dump on Glendale Avenue owned by Constable Biggs.

W. R. Mauter

W. R. Mauter

WRM:bw
cc: R. H. Wholf

P.S
B.S.T

The memo on "Past Practices for Disposal of Waste Materials" is ~~true~~ essentially true as stated.

John P. Loomis

Content of memo appears to be correct, no information which would indicate differently known to me. Woon Holmes 6/6/79

To the best of my recollection above statements are factual.

R Seaman
B. J. Schaller

Information as presented is true to my best recollection.

E. KRATZMAN. 4/30/79

1958 - To 1969

Suggest J EVAN might know some of info needed.

Terry Little a local dispose handled Plasticizer waste - on one occasion (crude plasticizer with carbon oily carbon) was known to have dumped load illegally into storm sewer and subseq. went to yacht basin which damaged boats in river -

butyl acetate waste may have been sent to ... for ... ?

? same as above t[illegible] some unusable wash solvents → (...) [illegible]

(... 3 years around ... butylated urea filter press ...)
Solid - ph - mal. anhydrate - filter [illegible] - filter cake - floor sweeping -

(spent carbon (contained plasticizer) was sent to customer for reprocessing (maybe went into making rubber compounding.

phenol (spills went to sewer at 25#/day - R Ray may have some detail) [illegible]

~~cyanic~~ cresylic acid - tar acid - did not go to landfill - were disposed of by bleeding to sewer).

Caustic Solutions Waste Solutions from plasticizer process went to [illegible] [illegible] - [illegible] [illegible] [illegible] with [illegible] [illegible].

[illegible] [illegible]

[illegible] [illegible] [illegible] [illegible] [illegible] plasticizer [illegible] - [illegible]

gelled resin ~~2~~ 4 batches went to landfill - → pick up [illegible]?

Waste to Friedman - [illegible] waste

~~[illegible]~~ [illegible]

Urea filter cake waste [illegible] [illegible] [illegible] [illegible] [illegible] [illegible] [illegible]

Plastein waste some overseas [illegible] to drum then to landfill - [illegible]

• Most of these waste [illegible]

#~~2 Kettle Distiller~~

Old. [illegible] waste to landfill — maybe city dump until closed for [illegible] ?
(City dump did not send resin — [illegible])

Empty drums — [illegible] [illegible] [illegible] amts. of resin sent to J. Bloom

E. L. Kratzman

D&R 6047

HAND OR TYPEWRITE YOUR MESSAGE.
SNAP OUT CANARY DUPLICATE COPY.
FORWARD ORIGINAL AND TRIPLICATE COPIES INTACT TO ADDRESSEE WHO WILL REPLY IN LOWER PORTION OF FORM RETAINING WHITE ORIGINAL AND RETURNING PINK TRIPLICATE COPY TO ORIGINATOR.

RECEIVED
JUN 5 1979
R. H. WHOLF

Allied Chemical

Allied Chemical Corporation
Inter-Office Communication

→ TO RH Wholf | LOCATION | DATE 6/5/79

FROM W von Harling | LOCATION

SUBJECT Past practices for Disposal of Waste Materials

Bob - I read your letter and am not aware of additional or different information.

SIGNATURE W. von Harling

REPLY

DATE

SIGNATURE

C 660 (9-74)

1957- 65
'60

- any report on wastes 1960's
- anything at all Dura
- any lab reports on wastes (analyses)
- any reports of env. incidents in 60's

450138 PLASKON OH SNU
6/85 4540

EXHIBIT C-2

PLASKON ELECTRONIC MATERIALS, INC. & PLASKON PRODUCTS, INC.

WASTE DISPOSAL SITES

JULY 10, 1979 TO PRESENT

LOS ANGELES

Mission County Landfill No. 3
2201 North Sepulveda
Los Angeles, California 90049

Calabassas Landfill No. 5
26919 Ventura Boulevard
Agoura, California 91301

BKK Landfill Sanitary Landfill
2210 South Azusa
West Covina, California 91791

TOLEDO

Westover Corp. Sanitary Landfill
819 Otter Creek Road
Toledo, Ohio 43616

General Electric Apparatus Service Division
156 Circle Freeway Drive
Cincinnati, Ohio 45200

Stauffer Chemical Corporation
Special Chemical Division
Sand Creek Highway
Weston, Michigan 49289

Ace Oil Co.
876 Otter Creek Road
Toledo, Ohio 43616

Chemical Waste Management, Inc.
4645 Executive Drive
Columbus, Ohio 43220

Cousins Waste Control Corporation
P. O. Box 2881
Toledo, Ohio 43606

Browning Ferris Industries
P. O. Box C
5400 Cogswell Road
Wayne, Michigan 48184

Waste Management of Alabama, Inc.
P. O. Box 55
Emelle, Alabama 35459

American Industrial Waste
Industrial Drive
White Bluff, Tennessee 37187

Ensco, Inc.
American Road
El Dorado, Arizona 71730

M. Petty & Sons
2800 Lagrange Street
Toledo, Ohio 43612

Stablex of South Carolina, Inc.
Ninth & Cooper Streets
P. O. Box 2664 CRS
Rockhill, South Carolina 29731-2664

Malvern Chemical Co.
Route #3, Gifford
Malvern, Arkansas 72104

Ross Administrative Services, Inc.
394 Giles Road
Grafton, Ohio 44044-9752

Michigan Disposal, Inc.
4935 North Service Drive
Belleville, Michigan 48111

Wayne Disposal, Inc.
P O Box 5187
Dearborn, Michigan 48124

Petro Chemical Processing
421 Lycaste
Detroit, Michigan 48124

7/12/84

450148

4541

J. Douglas McKee, I.H.
CONSULTANT
418 S. MAIN ST.
BOWLING GREEN, OHIO 43402

SPECIALISTS IN INDUSTRIAL HYGIENE AND SAFETY

CERTIFIED SAFETY PROFESSIONAL
CSP 4720

TELEPHONE 419-352-4443

June 8, 1984

Dr. Richard T. Bennett, President
Plaskon Products, Inc.
2829 Glendale Avenue
Toledo, Ohio 43614

Dear Dr. Bennett:

Plaskon Products, Inc., has for years, held an EPA Hazardous Waste Treatment, Storage, and Disposal facility (TS&D) interim status permit. This EPA permit allowed longer term waste storage on site, treatment, and overall greater latitude than simple generator status. With this permit though came the burden of a large permit fee, regular inspections by the EPA and plant personnel, and a lot of paperwork. This was fine while the urea formaldehyde plant was operating and generating large amounts of wastes, but with the closure of that facility, it was decided that it would no longer be worth the hassle to keep the permit valid. Also, the closing of the amino operation necessitated compliance with certain EPA rules regarding partial closure.

Quite a while back, Bob Wholf initiated closure and permit elimination via letters to the EPA. More recently, I was asked to follow up on said notification and coordinate and complete the actual closure in compliance with an extended EPA deadline of March 15, 1984. This letter is notification to you that that deadline was met and that closure is complete and has been certified. All wastes have been removed from the closed portion of the site and have been disposed of; only a few loose ends remain which will be discussed later.

Enclosed is a description of some of our accomplishments regarding the closure and waste disposal effort:

--Liaison with Government Officials

Prior to and during closure, contacts were made, and a close working relationship established with appropriate USEPA, Ohio EPA, City of Toledo, and other government officials as needed to assure that we were meeting the letter and intent of the laws. I assured all involved that it was the intent

of Plaskon Management to fully comply with all applicable regulations or specially imposed requirements. EPA officials agreed with the plan I submitted which again had a twofold purpose: (1) to close the Amino U/F operation, and (2) to eliminate the need for a Hazardous Waste TS&D facility permit since the remaining FEMCO operation will generate very little hazardous waste in comparison.

--Initial Inventory

Closure rules dictate that all hazardous wastes be removed from the plant to disposal sites prior to the deadline. Further, I was asked to remove all wastes from the areas involved, both hazardous and non-hazardous, as part of an overall clean-up effort. Initially, with the help of Ron Schrecongost, I began to inspect all plant areas and tanks, and assemble a current Waste Product Inventory. Over 100 different waste streams were discovered, not including the approximately 1000 different chemical pigments. These waste streams represented a multitude of various chemical compounds, both solid and liquid, hazardous and non-hazardous. Far more was found than was originally anticipated. As wastes were discovered, each was given an individual waste product number. Following are a few examples of some of the wastes found:

1. Approximately 15-20,000 gallons of waste plasticizers, alcohols, solvents, monomers, phthalates, acids, alkalies, and other liquid chemicals remaining from the coating resins and amino manufacturing days.

2. 9000 lbs. of caustic, solidified in a large tank. (When dissolved, this turned into about 14,000 gallons of caustic waste solution.)

3. Old lab chemicals/lab waste from several laboratories.

4. Unused, contaminated raw materials both solid and liquid (e.g., maleic anhydride, fumaric acid, TCPA, etc.)

5. Approximately 40 - 55 gallon drums of waste oils.

6. Chemicals and pigments containing heavy metals.

7. Acids and caustics.

8. Sludges left in the bottoms of various tanks and containers.

9. Asbestos insulation removed from tanks and piping in tank farm.

10. Old molding compounds and samples.

11. Approximately 750 drums of paraformaldehyde or formalin solution.

12. And other miscellaneous wastes, in small quantities, such as: MFA distillates, sewer pit cleanout wastes, old cleaning chemicals (oakite), kettle condensates, oil skims, and chlorinated and unchlorinated cleaning solvents.

Many of the wastes found had to be identified or confirmed via laboratory tests due to their age, condition, or inadequate or no labeling.

--Staging and Processing

After initial inventory was developed, many of the wastes were removed from tanks or containers where necessary and moved to one of several staging areas on-site. Here, the wastes were repackaged or redrummed if needed, properly labeled, renumbered or anything else necessary to properly prepare the wastes. Other wastes were left in tanks for later pump-out or until permission was received from the City of Toledo to slowly sewer certain chemicals (mainly sodium hydroxide and formalin solutions). The caustic was removed from its tank by steam dissolving over a 4-day period, placed in a holding tank and sewered gradually over 2-3 weeks. All sewering was done with great care and with daily sewer monitoring of COD, BOD, and PH to assure that we stayed within dictated guidelines. No major problems were noted during the sewering operations. After final pump-out of some of the classified hazardous wastes, either a triple rinse or cleanout with floor dry was used to assure that all remaining traces of the wastes were gone.

--Transportation/Disposal

After wastes were identified, assembled, logged and so on, it was necessary to find proper, acceptable disposal sites for each. Many facilities were contacted as well as recyclers, reclaimers, etc. Some of the wastes were sent out on a trial basis for experimentation to assure that the proposed methods of disposal would indeed work. Results indicated that disposal of the paraform via incineration was not only feasible, but a very viable alternative. By law, detailed Waste Product Surveys had to be made out for each waste that was to be sent off-site to another facility. That facility would, in turn, either grant or deny permission to have the waste sent to their site. After several visits to prospective disposal sites, alternatives were developed and presented to management. Decisions were then made as to what facilities and types of disposal would be used. The bulk of the wastes were incinerated at three different thermal destruction sites. The paraform went to Stablex-Reutter in South Carolina; the high BTU content liquids (plasticizers, alcohols, etc.) were blended at Petro-Chemical, Inc. for use as blast furnace fuel, and a variety of other toxic solids and liquids were sent to Ross Incineration. Some of the aqueous solution wastes were sent to Michigan Disposal to be neutralized, fixated, and landfilled. Other non-hazardous, solid wastes were simply landfilled in the normal way. A few chemicals were able to be reused by the PENCO operation, but another recycling/reclaim test (the dissolving and use of the paraformaldehyde by Malvern Chemical) was not considered a viable alternative due to liability and the length of time needed for the operation to be completed.

All waste was thoroughly manifested prior to transportation and all D.O.T. regulations such as for labeling, marking, placarding, and packaging were complied with. Cousins Waste Control transported much of the waste and also pumped many of the liquids from tanks via a 4000-gallon vacuum truck. Other truck lines were also used to haul some of the wastes and no incidents

occurred. Visual confirmation has been made of the Ross disposal effort and the Stablex-Reutter site will be checked next week by myself to confirm and document the paraformaldehyde disposal.

--Final Inspections and Certification of Closure

Several final inspections have been made of the Plaskon facilities. First, I made several tours to assure the clean-up was complete and to tie up loose ends. As required by law, we had an independent Professional Engineer, William Auberle, tour the site. He certified that we had properly disposed of all wastes and had completed the partial closure. Further, the EPA sent an inspector out recently to tour the facility and he again certified by letter to his superiors that we had done a proper job and that he found no violations regarding the completed closure. Letters of certification of closure from both Plaskon management and the independent Professional Engineer were sent to the EPA in Columbus, Ohio, and we are now awaiting their response and final disposition in this matter. It is thought that we will soon be under generator or small generator status and that the 12-Digit Plaskon Products, Inc. EPA I.D. Number will be transferred to the PEMCO operation. In anticipation of this, we are drafting up new waste control procedures and waste handling methods. The hazardous waste storage shed is being cleaned and wastes in the interim are being processed for disposal. Generator regulations will mandate that no hazardous waste be accumulated on-site longer than 90 days. Further, there are many other regulations concerning other topics that we must abide by.

--Summary

In summary, I feel that the partial closure, the waste disposal and all other tasks involved, were accomplished without incident, and in accordance with all applicable EPA, City of Toledo, OSHA, and other regulations. Soon, after a few remaining tasks are accomplished and final disposition is received from the EPA, we should be in a position to administer a down-scaled, efficient, waste control program in compliance with generator status requirements.

If you have further questions, please feel free to contact me. I will update you on further developments as necessary.

Very truly yours,

Doug McKee, CSP, IH

Enclosure

cc: M.N. Riddell
A.J. tenBrink
R.D.Kelly
J.C.Peterson

F 4/3/86
Plaskon Elec Env

6164

450131

B. TOLEDO, OHIO FACILITY ("TOLEDO FACILITY")

I. WATER

a. National Pollutant Discharge Elimination System (NPDES) Permit

Allied submitted applications (No. OH 070 OX 5-2-710637) to the U. S. Army Corps of Engineers on June 30, 1971, revised April 27, 1972, for discharge of uncontaminated cooling water, steam condensate, and storm runoff contaminated with ammonia-nitrogen into Delaware Creek, a tributary of the Maumee River. An NPDES Permit (No. OH 0033731) for this discharge, effective March 8, 1974, and expiring on February 28, 1979, was issued to Allied by the U.S. Environmental Protection Agency, Region V ("USEPA V").

The permit was subsequently administered by the Ohio Environmental Protection Agency (OEPA). On August 25, 1978, Allied submitted to the OEPA an application for renewal of NPDES Permit OH 0033731 on OEPA Short Form R for NPDES Permit OH 0033731. The OEPA acknowledged receipt of the application by letter, dated January 24, 1979, and advised that the then current permit conditions would remain in effect until a new permit was issued.

A new permit (OEPA Permit No. F 200*BD) was issued June 17, 1980 by the OEPA to Plaskon Products, Inc. (Attachment "A"). In June, 1983, the OEPA notified Plaskon Products that the old Permit Number F200 was being changed to the new Number 21F00000 and that, coincident with the new number, the station code I.D. Number was being changed from F200001 to 21F00000001 (Attachment "B").

On September 13, 1983, the Company requested that the OEPA change the name of NPDES Permit No. 21F00000 from Plaskon Products, Inc. to that of the Company (Attachment "C"). The OEPA acknowledged that this change was made September 22, 1983(Attachment "D").

b. Discharge to Toledo Water Reclamation Department

Sanitary and process wastes from the Toledo Facility are commingled and discharged into the municipal treatment system operated by the Water Reclamation Department, City of Toledo. Monitoring of this discharge for chemical oxygen demand (COD) and pH is performed on composite samples collected twice a week. The COD and pH results are reported quarterly to the Commissioner, Water Reclamation Department,

for sewer surcharge billing purposes as specified in the Toledo Municipal Code, "Regulations" Governing Sewer Use, Industrial Wastes and Surcharges." The Water Reclamation Department also obtains both a grab and twenty-four hour composite sample on a quarterly basis. In the most recent report dated June 13, 1984 for the period March 1984 through May, 1984 (Attachment "E") the reported discharge average values were 33 ppm COD and 7.3 pH units. None of such reported average discharges exceeded the permissible levels pursuant to "Regulations Governing Sewer Use, Industrial Wastes and Surcharges" as specified in the Toledo Municipal Code.

In the event of a major spill or increase in the concentration of organic pollutants, the Toledo Facility has the capability to stop discharges in the sanitary sewer system and divert the wastewater into a 60,000 gallon capacity aboveground holding tank. This tank, installed in 1967, is capable of retaining several days of wastewater flow under normal plant operating conditions. These systems were installed primarily to reduce the risk of shock loads to the municipal sewage treatment system. Some of the more significant past discharge incidents were: a) a discharge into the municipal sewer of phenolic resin and distillate wastes, containing approximately 1700 lbs. of phenol, on June 7, 1963, b) a discharge in excess of 4,000 lbs. of phenol into the sanitary sewer system on February 15, 1965, c) a discharge of approximately 5,000 lbs. of 50% formaldehyde into the municipal sewer system on July 19, 1965; and d) a discharge of an estimated 500-700 gallons of isodectyl alcohol into the municipal sewer system on February 4, 1970. There were other discharges prior to and during this period, but there have been no other major discharges reported since the construction of the holding tank in 1967 except as described herein.

As part of the closure of the amino plant and disposal of various waste materials, dilute formalin and dilute caustic solution were discharged to the municipal sewer system. Before these solutions were discharged, Water Reclamation Department was notified and its approval was obtained. During this period of nonstandard discharging, increased sampling and analysis of the effluent stream for formaldehyde content was instituted. This period of nonstandard discharge is covered in two reports dated March 26, 1984 and December 7, 1983 for the periods December 1983 through February 1984 and September 1983 through November 1983, respectively (Attachment "F").

It is recommended that Buyer not discharge wastes into the Toledo Water Reclamation District until it makes the

necessary notifications and arrangements with municipal authorities.

c. Spill Prevention Control and Countermeasure (SPCC) Plan

The Toledo Facility SPCC Plan required by 40 CFR Part 112, initially certified on June 11, 1974 and revised September, 1979, has been implemented. An inspection on August 23, 1983 by the USEPA confirmed that this plan conforms to the requirements of 40 CFR Part 112 (Attachment "G"). A new SPCC Plan to simplify the plan in accordance with the decrease in the generation of liquid wastes by the Toledo Facility since the discontinuation of urea-formaldehyde manufacturing operations is currently in preparation (Attachment "H"). There have been no reportable oil spills from this facility since the effective date of federal regulations (January 10, 1974).

The OEPA is currently investigating an allegation made by a former employee that in the 1950's a predecessor operator of the Toledo Facility released hazardous wastes into the Delaware Creek. While Plaskon Products was notified by Allied that involuntary spills had been made at various times in the past, it has no knowledge of any spills conforming to the description contained in the complaint. On May 17, 1984 Mr. David Fergurson of the OEPA made a preliminary investigation of the sewer system and sewer outfall into the Delaware Creek and notified the Company that he intends to continue the investigation into this spill in the future.

II. AIR

a. Air Permits - Processes and Process Emission Sources

The Toledo Facility currently has twenty-five (25) permitted or registered "air contamination sources." Four (4) additional permits for the package boilers installed in the fall of 1983 are pending (Attachment "I"). On September 13, 1983, the Company submitted a request to the Toledo Environmental Services Agency to transfer from Plaskon Products, Inc. to the Company permits for the operation of equipment used by the Company (Attachment "J"). An extensive reduction and resultant modification of this current system, which will ultimately reduce the number of existing permits and registrations to thirteen (13), is in progress (Attachment "JJ"). Administratively, this reduction in existing permits must be performed by the OEPA prior to the transfer of permits.

b. Boiler Permits and Emission Limitations

Prior to 1983, three large boilers were available for the generation of steam. Boilers No. 1 (OEPA Permit to Operate 044801U071-B001) and No. 2 (OEPA Permit to Operate 0448010071-B002) are rated at 24mm BTU/hr. heat input. Boiler No. 3 (permit to operate 0448010071-BU03) is rated at 55 mm BTU/hr. heat input. Under the permits, flexibility exists to operate these boilers with either coal or oil. Applications for renewal of these boiler permits, which were due to expire in mid-1983, were submitted in December 1982 and January 1983. Although these permits were subsequently renewed (Attachment "K"), the renewed permits specify several new terms and conditions for boiler operations, including a requirement that the boilers undergo a "stack test" to review boiler emissions prior to usage. The large boilers were shut down in May 1983, prior to the expiration date of the old permits, and have not been restarted. The permits are being maintained solely to operate the boilers under certain "grandfather" provisions of local law, as the boilers would not otherwise be permitted to operate under current law.

Before the renewals of these permits were actually issued, it was determined that the requirements for steam could best be met by the installation of four (4) new package boilers. These boilers operate on either gas or oil. Applications to install and operate the four (4) new boilers were filed in September 1983 (Attachment "I"). Final issuance of the permits to operate these package boilers is pending, and the boilers are being used on an interim basis until the permits are granted.

III. SOLID AND LIQUID WASTE DISPOSAL

a. Toledo Facility Status under Resource Conservation and Recovery Act ("RCRA")

Plaskon Products, Inc. applied for a permit as a hazardous waste storage facility under RCRA on October 30, 1980 (Attachment "L"). A revision to the original application was submitted November 12, 1980 (Attachment "M"). An additional revised application was filed September 8, 1981 (Attachment "N"). The USEPA granted Plaskon Products, Inc. interim status as a hazardous waste management facility May 19, 1982 (Attachement "O").

After the discontinuation of the urea-formaldehyde molding compound business of Plaskon Products, that company initiated closure proceedings with the USEPA and the OEPA, with respect to the portion of the plant that had been used in

the urea-formaldehyde operations. These proceedings require the removal of all hazardous waste generated in that portion of the Facility and the inspection of such portion of the facility to ensure that the disposal of the hazardous wastes was complete. At present the removal of the wastes has been completed, that portion of the Toledo Facility has been inspected by independent professional engineer who has certified that Plaskon Products has properly disposed of the wastes and has completed the partial closure of the Toledo Facility and the OEPA has sent an inspector to the facility and has certified that no hazardous waste was found in that portion. At present Plaskon Products is awaiting final disposition of the matter from the USEPA and the OEPA.

Also in connection with the discontinuation of the urea-formaldehyde molding compound business of Plaskon Products, the Company has applied for a modification of its permit status to eliminate the need for a hazardous waste storage facility permit under RCRA and replacing such status with generator status under RCRA. Currently Plaskon Products is in the process of transferring its RCRA registration to the Company. Under RCRA, the Company's operations would be classified as small generator status and the Company has notified the OEPA that it intends to be classified as such but will maintain all the necessary paperwork and meet all requirements for generator classification.

Mr. J. D. McKee, a consultant, was retained to coordinate both the closure of the urea-formaldehyde portion of the Toledo Facility and the change in status under RCRA. He has recently summarized the progress in this area in a report dated June 8, 1984 (Attachments "H", "P", "Q", "R", "S", "T", and "U"). Formal notification from the OEPA that the change in the status of the Toledo Facility has been accomplished is pending.

b. Current Offsite Disposal

Certain plant solid wastes (pallets, paper, fiber drums, and scrap thermoset molding compounds) are commingled and hauled by Seller to the Westover Municipal Landfill, Oregon, Ohio. Approximately 80 cubic yards per week of this type of waste are generated. Previously, when No. 3 boiler was operated with coal, an estimated 20,000 pounds/week of flyash was hauled to Westover Landfill for disposal.

Leachate analyses performed by the Jones & Henry Laboratories on representative epoxy molding products (Mix #6, 7 and 8) reported July 11, 1980 and a reanalysis of Mix #7 type product reported October 21, 1980, indicated that these

materials are not deemed to be hazardous based on federal regulations promulgated under the provisions of the Resource Conservation and Recovery Act (Attachment "V"), and the Company presently intends to continue to dispose of such materials at the Westover Municipal Landfill.

New plans and procedures are currently being developed for disposal of both hazardous and nonhazardous waste generating by the operations of the Company. The simplified procedures will be in compliance with the pending generator status referred to above (Attachment "H"). The two common types of wastes that will be produced on a continuing basis are a mixture of waste laboratory solvents and mixed lubricating/hyraulic oils.

As part of the routine quality control testing of epoxy molding compound, as much as one hundred (100) gallons/month of acetone solution are generated. Recently, the recovery and recycling of acetone by the distillation of this solution has been started. The regulations promulgated under the Resource Conservation and Recovery Act define still bottoms from acetone recovery as a hazardous waste, F-003. Based on the specific nature of this residue, the OEPA has been requested to exempt the solid material generated by the distillation from the F-003 hazardous waste definition (Attachment "W"). Pending granting of this exemption, the residue is being treated in compliance with hazardous waste regulations.

In February 1983, a 1000 KVA General Electric transformer (Serial No. 857512) containing 380 gallons of Pyranol (PCB) failed. A purchase contract for the disposal of this transformer, which is in compliance with EPA Regulation 40CFR, Part 761, is pending with the ILWD Corporation.

Polychlorinated Biphenyls (PCB's) are present in electrical switch gear, capacitors and service transformers for the Toledo Facility. PCB containing transformers and capacitor banks have been inventoried, labeled and are inspected quarterly in accord with EPA regulation 40 CFR 761. The most recent annual PCB report and quarterly inspection report contain specific details (Attachment "X"). As well as the failed transformer currently being disposed (Section III(b)) another PCB containing transformer failed and was disposed of by Chemical Waste Manangement, Inc., Emelle, Alabama in 1982 (Attachment "Y").

A collection of chemical wastes was disposed of at Chemical Waste Management Landfill in the fall of 1980. Due to the ignitability or composition of these materials they were all considered as hazardous wastes (Attachment "Z").

In conjunction with the closure of the urea-formaldehyde manufacturing operations and the pending change to generator status, a variety of wastes were disposed of in the first half of 1984. The attached report dated June 8, 1984 by the consultant, J. D. McKee, retained to coordinate these activities, summarize the disposition of these wastes (Attachment "H).

c. Prior Off-Site Disposal by Allied

From about 1971 to 1977, small quantities (5-6 gallons/day liquid acetone/epoxy wastes were collected in drums and pails and hauled by contractor, J. L. Spradlin, to the Evergreen Landfill, Wood County, Ohio. Subsequently, upon internal review, it was ascertained from the OEPA that the Evergreen Landfill was not authorized to dispose of liquid wastes or sludges. In January, 1977, disposal at Evergreen Landfill was terminated.

On May 25, 1977, in response to an inquiry, Allied advised Dr. J. F. Finles, Director of NIOSE, that no polybrominated biphenyls were on site. This response was amended on September 7, 1977 when approximately 100 pounds of Firemaster BP-6 (Michigan Chemical's polybrominated biphyenyl) was found on-site. The polybrominated biphenyl material had been used in 1974 to produce a small quantity of experimental molding compound. Unused BP-6, received from Michigan Chemical, was resold to the Samuel Moor Company, Aurora, Ohio. The residual 100 pounds of BP-6 found on-site was shipped off-site for disposal at Nuclear Engineering Co., Sheffield, Illinois.

In 1977 after the plant had discontinued use of benzidine yellow pigment and in response to a Section 114 request from USEPA, Allied stated that approximately 20 pounds of such pigment would be removed and incinerated by ChemDyne, Hamilton, Ohio. However, this material was disposed of at the Nuclear Engineering Company, Sheffield, Illinois.

Particulate matter, removed from certain dust collectors, probably contained small quantities of asbestos. This material was comingled with other plant trash and landfilled at the Westover Municipal Landfill. Use of asbestos as a filler in molding compound manufacture was discontinued in late 1977. Unused asbestos, approximately 28 pallets, was covered with plastic sheeting, properly labeled, and disposed of at the Westover Municipal Landfill in Oregon, Ohio. The landfill operator covered the material immediately after dumping.

d. On-Site Disposal Since July 10, 1979

There are no records indicating that any on-site disposal of hazardous wastes has occurred at this Facility to the best of the knowledge and belief of the Company.

e. On-Site Disposal Prior to July 10, 1979

Manufacture of phthalate esters at Allied's Toledo plant was terminated in 1970. The ground in process areas of the plant may contain minimal quantities of various materials used in manufacturing operations. Allied has stated that an area of contamination may be the former phthalate ester operations. Runoff from this area is processed through an underflow below ground oil/water separator before discharge into the municipal sewer system. Accumulated sludges and esters were last removed from the oil/water separator in 1977. The degree of residual contamination of the ground and/or storm-water runoff is unknown, but Allied has stated that it is believed to be minimal.

Use of an on-site settling pond for scrubbing water from the Rotoclone Scrubbers was discontinued in 1971 when a new dry particulate collection system was installed. Settled amino molding compound was removed from the unlined pond and landfilled off-site. The basin was then backfilled with earth and seeded. The extent of any contamination from molding compound that remained after cleaning is unknown; but Allied has stated that it is believed to be minimal.

IV. OTHER CONSIDERATIONS

In 1953 Allied purchased the site from Libbey Owens Ford. Plaskon Products, Inc. purchased the site in 1979. In 1983, Plaskon Products entered into a lease for the portion of the site used by the Company in its operations.

Prior to 1978, asbestos was used as a filler in certain molding compounds at this site.

PLASKON

PLASKON PRODUCTS, INC.

October 20, 1982

Mr. E. Shields
Allied Corporation
P.O. Box 1139R
Morristown, NJ 07960

Dear Ed:

As requested during our telephone conversation today, enclosed is a copy of some pertinent information from the Honorable Bob Eckhardt survey file on past practices of disposal of waste materials generated by the Toledo Plant.

According to the file, the Terry Little Company removed plasticizer wastes and other oil waste products from the Toledo Plant. Plasticizers were produced at this location from 1959 to 1969, which would encompass the year 1968 that you indicated was under review.

The enclosures include all the records or documents that have been found concerning disposal of wastes by the Terry Little Company during the subject period. I understand we have no purchase orders, accounts payable or other records prior to 1973.

According to the recollections of employees, the plasticizer wastes included scrap plasticizers and spent recycle alcohols. The plasticizers were manufactured from phthalic anhydride and long chain (8 and 10 carbon) aliphatic alcohols. The other waste oils included conventional lubricating and hydraulic oils.

If you have any questions concerning this information, please let me know.

Very truly yours,

R. H. Wholf, Manager
Environmental Services

RHW:ibh
Enclosures: W. R. Mauter to R. J. Donovan, etal - 5/30/79
E. L. Kratzman notes dated 4/30/79
W. H vonHarling to R. H. Wholf - 6/5/79

cc: W. R. Mauter
E. L. Kratzman

2829 Glendale Avenue • Toledo, Ohio 43614 • (419) 382-5611

450150

4540

OhioEPA

Re: Lucas County
Hazardous Waste
Plaskon Products, Inc.
HWFAB# 03-48-0143
USEPA#OHD094808904
G-TSDF to SQG

Mr. Tom Carlisle, Manager
Technical Assistance
Division of Solid & Hazardous Waste Mgt.
Ohio EPA
361 East Broad Street
Columbus, Ohio 43215

May 13, 1984

Toledo

Dear Mr. Carlisle:

On May 17, 1984, all of the closed portions of Plaskon Products, Inc. were inspected for final closure by Doug McKee, Consultant, and myself. No hazardous waste was found. Blueprints of the facility were used to make certain that no portion of the closed facility was not inspected.

The open portion of the facility is being operated under the new name, Plaskon Electronic Materials, Inc. (PEMCO).

Marie Oliver, RCRA Activities, Region V, USEPA, recommended that the EPA ID number be transferred from the closed facility to the "new" one. This is verified in the April 5, 1984, letter to RCRA activities. See attachment.

PEMCO will be classified a small quantity generator but intends to maintain all the necessary paperwork and meet all requirements for a generator classification.

Yours truly,

David L. Ferguson

David L. Ferguson
Division of Solid & Hazardous Waste Mgt.

DLF/1st

cc: Paula Cotter, DSHWM
cc: Plaskon Electronic Materials, Inc.
cc: Doug McKee
cc: File